

Exhibit 4

Damages Estimate and Other Relevant Analyses Memorandum



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Memorandum

Les Jacobowitz

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Date: January 2, 2018

To: Hon. Naomi Reice Buchwald

cc: William C. Carmody, Esq.
Susman Godfrey LLP

Andrew A. Ruffino, Esq.
Covington & Burling LLP

From: Les Jacobowitz

Re: Damages Estimate and Other Relevant Analyses (Citibank) Relating to
In re LIBOR-Based Financial Instruments Antitrust Litigation, MDL No. 2262

As it was mentioned in Court during the Fairness Hearing in connection with the Barclay Settlement¹, and as confirmed in a subsequent discussion with Seth Ard of Susman Godfrey LLP with respect to overall damages, there has been no calculation of damages with respect to the instant litigation.

Since it has not otherwise been determined, enumerated below is my estimate of damages for OTC interest rate contracts utilizing a suppression report recognized by the parties and preliminarily approved by the Court for distributing Citibank Settlement funds.² In addition, set forth below is a comparison of the proposed settlement amount in the Citibank Settlement to the proposed settlement amount in the Barclays Settlement based upon overall relevant derivatives exposure of the holding companies of each bank.

¹ See Barclays Settlement Fairness Hearing Transcript, page 46, lines 10-12, and page 58, lines 8-17.

² Although it might be appropriate to deduct notional amounts related to the seventeen (17) parties that have opted-out of the Barclays Settlement, not all of such parties' derivatives information is readily available from their financial statements. In addition, many financial statements do not identify the bank counterparty on a derivative so it would be difficult to properly exclude those interest rate derivatives from Citibank's average notional amounts during the Class Period assuming the same parties opt-out of the Citibank Settlement.

This memorandum is derived from various public sources and has relied on various assumptions including, but not limited to, bank notional amounts for derivatives and %USD of such notional amounts. It should be noted that the parties to the litigation should have all of the relevant data to make an exact calculation of damages for Class Members but, as best we can tell, this data has not been provided by the banks.

Suppression Damages Estimate

Sample Suppression Analyses

The following is based upon memoranda prepared by Swap Financial Group for (i) 1-month U.S. Dollar LIBOR (“LIBOR”), attached hereto as Exhibit A, and (ii) 3-month LIBOR, attached hereto as Exhibit B. According to Swap Financial Group, these LIBOR tenors constitute the vast majority of the interest rate contracts utilized in the U.S. market.³

In its 1-month LIBOR-based instrument analysis utilizing the Suppression Chart for the applicable LIBOR suppression during the Class Period, Swap Financial Group calculated damages as 0.003761793 of the notional amount of the subject interest rate contract.⁴

In its 3-month LIBOR-based instrument analysis utilizing the Suppression Chart for the applicable LIBOR suppression during the Class Period, Swap Financial Group calculated damages as 0.002580418 of the notional amount of the subject interest rate contract. The redacted swap confirmation used for this analysis is included in Exhibit B hereto.

Utilizing a weighted average of these two damage calculations of 0.002816693 (the “Assumed Overall Damages Multiplier”), based upon 20% of the market during the Class Period being 1-month LIBOR-based instruments and 80% of the market during the Class Period being 3-month LIBOR-based instruments, damages would equal the Assumed Overall Damages Multiplier *times* the aggregate notional amount in the market for USD LIBOR-based instruments.

³ For purposes of this analysis and based upon the experience of Swap Financial Group, it is assumed that 20% of the overall OTC interest rate contract market is comprised of 1-month LIBOR-based instruments and 80% of the overall OTC interest rate contract market is comprised of 3-month LIBOR-based instruments. Generally, to the extent that the weighted average USD LIBOR tenor is longer, this estimate will understate damages and, to the extent that the weighted average USD LIBOR tenor is shorter, this estimate will overstate damages. See the Summary of Estimated Suppression, attached hereto as Exhibit C (the “Suppression Chart”), which was utilized by Swap Financial Group in its analysis.

⁴ This interest rate contract was provided in connection with our client’s objection to the Barclays Settlement.

USD LIBOR-Based Market

For the purposes of the instant litigation, it is required that the interest rate contracts market be limited to LIBOR-based instruments sold in over-the-counter transactions with Citibank.

Office of the Comptroller of the Currency

The Office of the Comptroller of the Currency (“OCC”) issues its Quarterly Reports on Bank Derivatives Activities (the “OCC Reports”) based on Call Report information provided by all insured U.S. commercial banks and trust companies (the “US Financial Institutions”), as well as other published financial data.

Pursuant to a discussion I had with the OCC, the OCC Reports include derivatives in all currencies, including USD, and there is no data source it has used that would have broken out USD instruments, including in the non-public bank Call Reports.⁵

Federal Reserve

The Federal Reserve’s FR 2436 report collects data on notional amounts and gross market values of the volumes outstanding of broad categories of foreign exchange, interest rate, and equity- and commodity-linked OTC derivatives instruments. The data reported by individual U.S. dealers is not publicly available.⁶

Bank of International Settlements⁷

The Bank of International Settlements (“BIS”) Triennial Central Bank Survey is the most comprehensive source of information on the size and structure of the OTC derivatives markets.⁸ Aggregate country data are published semiannually by BIS.

⁵ See <https://www.occ.treas.gov/topics/capital-markets/financial-markets/derivatives/dq307.pdf>.

⁶ See https://www.newyorkfed.org/banking/reportingforms/FR_2436.html.

⁷ Established in 1930, BIS is an international financial organization owned by sixty (60) member central banks, representing countries from around the world that together make up about 95% of world GDP, with its lead office in Basel, Switzerland. See <https://www.bis.org/about/index.htm?m=1%7C1>. The mission of BIS is to serve central banks in their pursuit of monetary and financial stability, to foster international cooperation in those areas and to act as a bank for central banks. *Id.* BIS is the entity that facilitates the Basel process. See https://www.bis.org/about/basel_process.htm?m=1%7C3%7C605.

⁸ See introductory paragraph of “Triennial Central Bank Survey: OTC interest rate derivatives turnover in April 2016” on page 3.

As reported by BIS, the notional amounts outstanding of OTC single currency interest rate derivatives by instrument, counterparty and currency⁹, with reporting dealers and other financial institutions¹⁰, are as follows:

(in USD millions)

	end – June 2007			end – June 2010		
	USD	Total	% USD	USD	Total	% USD
Swaps ¹¹	\$73,687,926	\$265,106,702	27.8% ¹²	\$112,817,689	\$332,958,481	33.9% ¹³

It should be noted that using this BIS data for the US Financial Institutions reported on the OCC Reports may understate the % USD for their swaps since these US Financial Institutions, as they operate and are regulated in the U.S., likely have a higher percentage of USD LIBOR-based swaps than would the overall world market reported by BIS. However, the BIS figures are utilized for purposes of a conservative analysis.

Overall Damages Estimate

As reported in the OCC Reports during the Class Period¹⁴, the average notional amount of OTC interest rate contracts outstanding during the Class Period, and the % USD extrapolated from the BIS data, is as follows:

[table on following page]

⁹ Attached hereto as Exhibit D are the relevant pages from (i) the “BIS Triennial Central Bank Survey: Foreign exchange and derivatives market activity in 2007” (the “BIS 2007 Survey”) and (ii) the “BIS Triennial Central Bank Survey: Foreign exchange and derivatives market activity in 2010” (the “BIS 2010 Survey”).

¹⁰ This is to equate, as much as possible, to the OCC Reports which report data on commercial banks and trust companies.

¹¹ Excludes other non-financial customers. It should be noted that swaps were utilized rather than total interest rate contracts since it was not clear how options were calculated by type of institution.

¹² See BIS 2007 Survey, page 134, attached hereto; if data relating to overall interest rate contracts were utilized for all institutions, the %USD would be 31.8%.

¹³ See BIS 2010 Survey, page 3, attached hereto; if data relating to overall interest rate contracts were utilized for all institutions, the %USD would be 35.5%.

¹⁴ Since the OCC Reports are not available on a monthly basis, included are two months outside of the Class Period – July 2007 and June 2010.

Average USD Notional Amount of Interest Rate Contracts
(Citibank)
(in USD millions)

	Average Notional Amount ¹⁵	%USD ¹⁶	Average USD Notional Amount
2007 (2Q's)	\$24,794,714	27.8%	\$6,892,930
2008 (4Q's)	\$26,774,642	29.8%	\$7,978,843
2009 (4Q's)	\$25,287,423	31.8%	\$8,041,401
2010 (2Q's)	\$35,366,306	33.9%	\$11,989,178
Overall Average (per Q)			\$8,487,099

Based upon the Assumed Overall Damages Multiplier (0.002816693) *times* the Average USD Notional Amount of Citibank Interest Rate Contracts (\$8,487,099), the overall damages is estimated at \$23.9 billion.

The foregoing does not factor in that some interest rate contracts were based on non-LIBOR indexes. Importantly, the Assumed Overall Damages Multiplier is based upon two interest rate contracts tied to 70% of LIBOR. According to Swap Financial Group, the vast majority of interest rate contracts during the Class Period were based upon 100% of LIBOR. If that is the case, the foregoing overall damages estimate for Citibank interest rate contracts would be materially understated.

Barclays versus Citibank Settlements

Proposed Settlements

The proposed amount of the Barclays Settlement is \$120 million while the proposed amount of the Citibank Settlement is \$130 million, a disproportionate amount given the relative relevant OTC derivatives activities of the holding companies of these two entities.

¹⁵ See the OCC Reports for Third Quarter 2007, Fourth Quarter 2007, First Quarter 2008, Second Quarter 2008, Third Quarter 2008, Fourth Quarter 2008, First Quarter 2009, Second Quarter 2009, Third Quarter 2009, Fourth Quarter 2009, First Quarter 2010 and Second Quarter 2010 (collectively, the "Relevant OCC Reports"), the pertinent pages of which are attached hereto as Exhibit E; specifically Table 3 of these reports, which relates to Citigroup rather than Citibank, were utilized by taking Total Derivatives *times* Percent OTC Contracts *times* Percent Interest Rate Contracts.

¹⁶ Utilizing the BIS data of 27.8% of USD swaps in 2007 and 33.9% of USD swaps in 2010, and a stepped increase of %USD for 2008 and 2009 (i.e. USD 29.8% for 2008 and USD 31.8% for 2009).

Notional Amounts of Swaps and Forwards Outstanding

Set forth below is an estimate of the average amount of USD OTC swaps and forwards for the holding companies of these entities¹⁷:

Average USD Notional Amount of Swaps and Forwards
(Citigroup)
(in USD millions)

	Average Notional Amount	%USD ¹⁸	Average USD Notional Amount
2007 (2Q's)	\$23,017,650	27.8%	\$6,398,907
2008 (4Q's)	\$23,940,879	29.8%	\$7,134,382
2009 (4Q's)	\$22,699,383	31.8%	\$7,218,404
2010 (2Q's)	\$31,272,981	33.9%	\$10,601,541
Overall Average (per Q)			\$7,617,670

Average USD Notional Amount of Swaps and Forwards
(Barclays Group)
(in USD millions)

	Average Notional Amount	%USD ¹⁹	Average USD Notional Amount
2007 (2Q's)	\$48,410	27.8%	\$13,458
2008 (4Q's)	\$127,136	29.8%	\$37,886
2009 (4Q's)	\$196,495	31.8%	\$62,485
2010 (2Q's)	\$368,831	33.9%	\$125,034
Overall Average (per Q)			\$56,539

As Citigroup had an average notional amount of OTC USD relevant derivatives during the Class Period exceeding 100 times the average notional amount of OTC USD relevant derivatives of

¹⁷ See Table 2 of the Relevant OCC Reports by taking OTC Forwards *plus* OTC Swaps. It should be noted that this table was used since it is the Relevant OCC Report table that contains holding company data (which includes Barclays Group US Inc.), whereas the other Relevant OCC Report tables contain commercial bank and trust company data (which does not include Barclays).

¹⁸ See Footnote 14 above.

¹⁹ See Footnote 14 above.

Barclays during the Class Period, the Citibank Settlement is disproportionately low.²⁰ This is even more disproportionate if Barclays is given credit for its role as an “icebreaker” settling defendant in the instant litigation.

Conclusion

The foregoing analysis does not provide granular detail since much of the data required to undertake a more comprehensive analysis is not publicly available, in particular, on an individual bank basis, and has not been provided by the banks. To provide a more conservative analysis, the assumptions contained herein are generally made in the banks’ favor. Even so, the \$130 million agreed upon in settlement, even with the understanding that settlement necessarily requires compromise, is so disconnected from the best possible recovery that it cannot be fairly considered to be within the range of reasonableness. In fact, the \$130 million settlement amount represents less than a 1% recovery from estimated damages.

²⁰ If, instead, OTC swaps were used rather than OTC swaps and forwards, the difference would have been considerably more disproportionate.

Exhibit A

**LIBOR Suppression Analysis
(1-month LIBOR)**

Swap Financial Group

Swap Financial Group, LLC
135 West 50th St, 20th Floor
New York, NY 10020
Phone: 212-478-3700

MEMORANDUM

To: Les Jacobowitz
Arent Fox LLP

From: James Murphy
Swap Financial Group

Concerning: Suppression Analysis: 1-Month USD LIBOR

Date: December 29, 2017

Introduction

In connection with U.S. antitrust litigation regarding the alleged manipulation of LIBOR¹, the plaintiffs contend that LIBOR was suppressed by the defendant banks, which were responsible for determining LIBOR, during the period from August 2007 to May 2010. As a result, end users of LIBOR-based interest rate swaps and other products would have received less than they should have on any LIBOR-based receipts.

Analysis

As per your request, Swap Financial Group (“SFG”) has estimated the impact of this claimed LIBOR suppression for an interest rate swap between Maimonides Medical Center (the “Counterparty”) and Bank of America, NA (the “Bank”). Under the swap, the Counterparty pays a fixed rate and receives floating rate payments based on 1-month USD LIBOR (“LIBOR”). According to the expert witness for the plaintiffs and as shown in his suppression chart, the average suppression for 1-month USD LIBOR during the relevant period was 0.19%. In other words, 1-month LIBOR would have been, on average, 0.19% higher if not for the alleged manipulation of LIBOR by the defendant banks. To estimate the loss caused by such a suppression of LIBOR, SFG compared the estimated LIBOR-based receipts under the swap using historical resets for 1-month USD LIBOR as well as LIBOR plus 0.19%. The estimated receipts were calculated on

¹ The case is In re: Libor-Based Financial Instruments Antitrust Litigation, U.S. District Court, Southern District of New York, No. 11-md-02262.

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a monthly basis and took into account the amortizing notional schedules as shown in the relevant swap confirmation. A summary of the results appears in the table below.

Original Trade Date	Avg Notional Amt (June '07 to May '10)	Floating Rate Formula	Total Receipts (Historical LIBOR)	Total Receipts (LIBOR + 0.19%)	Difference
4/13/2006	\$29,000,000	70% of 1moLIBOR	\$1,145,582	\$1,254,674	(\$109,092)

Our analysis assumes the average suppression of 0.19% applies during the entire period from August 2007 to May 2010. It is reasonable to assume that the actual suppression levels would have varied during this period. If the exact suppression level was known for each relevant LIBOR reset date under the swap, a more exact calculation of damages could be made. However, we do not believe such results would be materially different from the estimates shown in the table above. Based on an average suppression of 0.19% during this period, SFG estimates that the Counterparty received approximately \$109,000 less than it would have if LIBOR was higher by 0.19%.

We expect this analysis to be comparable for any other swap where the floating rate receipts were based on LIBOR. Based on the expert's suppression chart, suppression levels differed depending on the tenor for LIBOR (i.e. 1-month, 3-month, 6-month, etc.). Based on our experience in the swaps market, the vast majority of LIBOR-based swaps use either 1-month or 3-month LIBOR as the relevant LIBOR index.

Swap Financial Group, LLC, founded in 1998, is an established advisor and arranger of swaps within the industry for interest rate swaps, options, and other derivatives and is professionally knowledgeable of the transaction type represented in this analysis. In the past three years, SFG has advised on hundreds of derivative transactions with a total notional of more than \$25 billion. SFG advises a board range of clients, including governmental issuers, non-profits and corporations.

Swap Financial Group

Exhibit B

**LIBOR Suppression Analysis
(3-month LIBOR)
and Related Swap Confirm**

Swap Financial Group

Swap Financial Group, LLC
135 West 50th St, 20th Floor
New York, NY 10020
Phone: 212-478-3700

MEMORANDUM

To: Les Jacobowitz
Arent Fox LLP

From: James Murphy
Swap Financial Group

Concerning: Suppression Analysis: 3-Month USD LIBOR

Date: December 29, 2017

Introduction

In connection with U.S. antitrust litigation regarding the alleged manipulation of LIBOR¹, the plaintiffs contend that LIBOR was suppressed by the defendant banks, which were responsible for determining LIBOR, during the period from August 2007 to May 2010. As a result, end users of LIBOR-based interest rate swaps and other products would have received less than they should have on any LIBOR-based receipts.

Analysis

As per your request, Swap Financial Group (“SFG”) has estimated the impact of this claimed LIBOR suppression for an interest rate swap between the client (the “Counterparty”) and JPMorgan Chase Bank, NA (the “Bank”). Under the swap, the Counterparty pays a fixed rate and receives floating rate payments based on 3-month USD LIBOR (“LIBOR”). According to the expert witness for the plaintiffs and as shown in his suppression chart, the average suppression for 3-month USD LIBOR during the relevant period was 0.13%. In other words, 3-month LIBOR would have been, on average, 0.13% higher if not for the alleged manipulation of LIBOR by the defendant banks. To estimate the loss caused by such a suppression of LIBOR, SFG compared the estimated LIBOR-based receipts under the swap using historical resets for 3-month USD LIBOR as well as LIBOR plus 0.13%. The estimated receipts were calculated on a monthly basis and took into account

¹ The case is In re: Libor-Based Financial Instruments Antitrust Litigation, U.S. District Court, Southern District of New York, No. 11-md-02262.

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the amortizing notional schedules as shown in the relevant swap confirmations. A summary of these results appears in the table below.

Original Trade Date	Notional Amount	Floating Rate Formula	Total Receipts (Historical LIBOR)	Total Receipts (LIBOR + 0.13%)	Difference
5/15/2005	\$58,547,500	70% of 3moLIBOR	\$2,513,234	\$2,664,311	(\$151,077)

Our analysis assumes the average suppression of 0.13% applies during the entire period from August 2007 to May 2010. It is reasonable to assume that the actual suppression levels would have varied during this period. If the exact suppression level was known for each relevant LIBOR reset date under the swaps, a more exact calculation of damages could be made. However, we do not believe such results would be materially different from the estimates shown in the table above. Based on an average suppression of 0.13% during this period, SFG estimates that the Counterparty received approximately \$151,000 less than it would have if LIBOR was higher by 0.13%.

We expect this analysis to be comparable for any other swap where the floating rate receipts were based on LIBOR. Based on the expert's suppression chart, suppression levels differed depending on the tenor for LIBOR (i.e. 1-month, 3-month, 6-month, etc.). Based on our experience in the swaps market, the vast majority of LIBOR-based swaps use either 1-month or 3-month LIBOR as the relevant LIBOR index.

Swap Financial Group, LLC, founded in 1998, is an established advisor and arranger of swaps within the industry for interest rate swaps, options, and other derivatives and is professionally knowledgeable of the transaction type represented in this analysis. In the past three years, SFG has advised on hundreds of derivative transactions with a total notional of more than \$25 billion. SFG advises a board range of clients, including governmental issuers, non-profits and corporations.

Swap Financial Group



Confirmation

Swap Transaction

Date: [REDACTED]

[REDACTED]

Re: Swap Transaction [REDACTED]

Ladies and Gentlemen:

The purpose of this Confirmation is to confirm the terms and conditions of the Swap Transaction entered into between us on the Trade Date specified below (the "Swap Transaction"). This Confirmation constitutes a "Confirmation" as referred to in the Agreement specified below.

The definitions and provisions contained in the 2000 ISDA Definitions, as published by the International Swaps and Derivatives Association, Inc. (the "Definition"), are incorporated into this Confirmation. In the event of any inconsistency between those definitions and provisions and this Confirmation, this Confirmation will govern.

1. This Confirmation supplements, forms part of, and is subject to, the Master Agreement dated as of 17 November 2003, as amended and supplemented from time to time (the "Agreement") between JPMorgan Chase Bank N.A. ("JPMorgan") and [REDACTED] (the "Counterparty"). All provisions contained in the Agreement govern this Confirmation except as expressly modified below.
2. The terms of the particular Swap Transaction to which this Confirmation relates are as follows:

Notional Amount:	As set forth on the attached Exhibit A
Trade Date:	18 May 2005
Effective Date:	06 July 2005
Termination Date:	01 July 2030, subject to adjustment in accordance with the Modified Following Business Day Convention

[REDACTED]



Floating Amounts:

Floating Rate Payer:	JPMorgan
Floating Rate Payer Payment Dates:	The 1 st calendar day in each month in each year, commencing with 01 August 2005 up to and including the Termination Date, subject to adjustment in accordance with the Modified Following Business Day Convention, and there will be an adjustment to the Calculation Period.
Floating Rate for initial Calculation Period:	To be determined
Floating Rate Option:	USD-LIBOR-BBA, except that the Floating Rate shall be determined on each Reset Date
Designated Maturity:	3-month USD-LIBOR-BBA
Spread:	None
Floating Rate Day Count Fraction:	Actual/Actual
Floating Amounts:	<p>The Floating Rate used to calculate the Floating Amount on each Payment Date will be equal to the rate determined in accordance with the specified Floating Rate Option and Designated Maturity, for the relevant Calculation Period, multiplied by 70.00000%. For the avoidance of doubt, the Floating Amount shall be calculated as follows:</p> $\text{Floating Amount} = \text{Notional Amount} * \text{Floating Rate} * 70.00000\% * \text{Day Count Fraction}$
Reset Dates:	Effective Date and thereafter on each Wednesday for value on each Thursday
Averaging:	Applicable
Method of Averaging:	Weighted
Compounding:	Inapplicable
Business Days:	New York, London



Fixed Amounts:

Fixed Rate Payer:	Counterparty
Fixed Payer Payment Dates:	The 1st calendar day in each month in each year, commencing with 01 August 2005 up to and including the Termination Date, subject to adjustment in accordance with the Modified Following Business Day Convention, and there will be an adjustment to the Calculation Period.
Fixed Rate	3.36000 percent
Fixed Rate Day Count Fraction:	30/360
Business Days:	New York, London
Calculation Agent:	JPMorgan or as stated in the Agreement.

3. Other Provisions:

Counterparty shall have the right to terminate this Transaction by providing (i) at least two (2) Business Days prior written notice to JPMorgan of its election to terminate this Transaction and (ii) evidence reasonably satisfactory to JPMorgan that Counterparty has or will have on the termination date available funds with which to pay any amount due to JPMorgan in connection with such early termination. On the Optional Termination Date set forth in such notice, an amount determined by JPMorgan, shall be payable by JPMorgan or the Counterparty, as the case may be, in respect of such termination. If such amount is not acceptable to Counterparty, then JPMorgan shall determine such amount in accordance to Section 6(e)(ii)(1) of the Master Agreement, assuming Market Quotation and Second Method apply and Counterparty is the sole affected Party. Notwithstanding anything herein to the contrary, the parties will be obligated to pay any accrued and unpaid amounts that would otherwise be due on the date of such optional termination.

4. Account Details

Payments to JPMorgan in USD:



Payments to Counterparty in USD:

As per your standard settlement instructions.

**Exhibit A**

Start Date	End Date	Notional Amount in USD
Effective Date	July 1, 2015	\$58,547,500.00
July 1, 2015	July 1, 2016	\$55,792,500.00
July 1, 2016	July 1, 2017	\$52,937,500.00
July 1, 2017	July 1, 2018	\$49,977,500.00
July 1, 2018	July 1, 2019	\$46,910,000.00
July 1, 2019	July 1, 2020	\$43,727,500.00
July 1, 2020	July 1, 2021	\$40,430,000.00
July 1, 2021	July 1, 2022	\$37,010,000.00
July 1, 2022	July 1, 2023	\$33,465,000.00
July 1, 2023	July 1, 2024	\$29,790,000.00
July 1, 2024	July 1, 2025	\$25,980,000.00
July 1, 2025	July 1, 2026	\$22,030,000.00
July 1, 2026	July 1, 2027	\$17,935,000.00
July 1, 2027	July 1, 2028	\$13,690,000.00
July 1, 2028	July 1, 2029	\$9,290,000.00
July 1, 2029	July 1, 2030	\$4,727,500.00

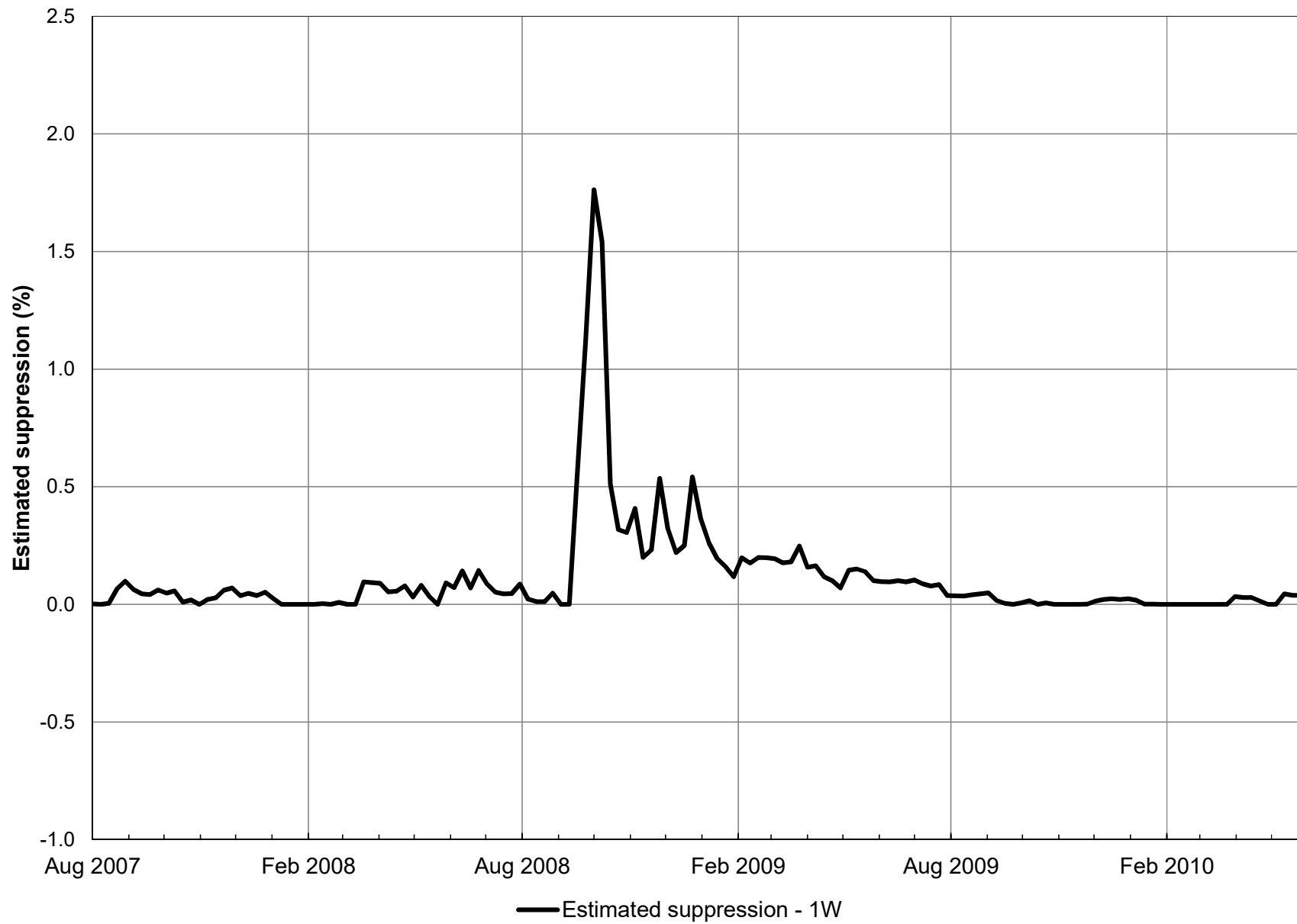
Exhibit C

LIBOR Suppression Chart

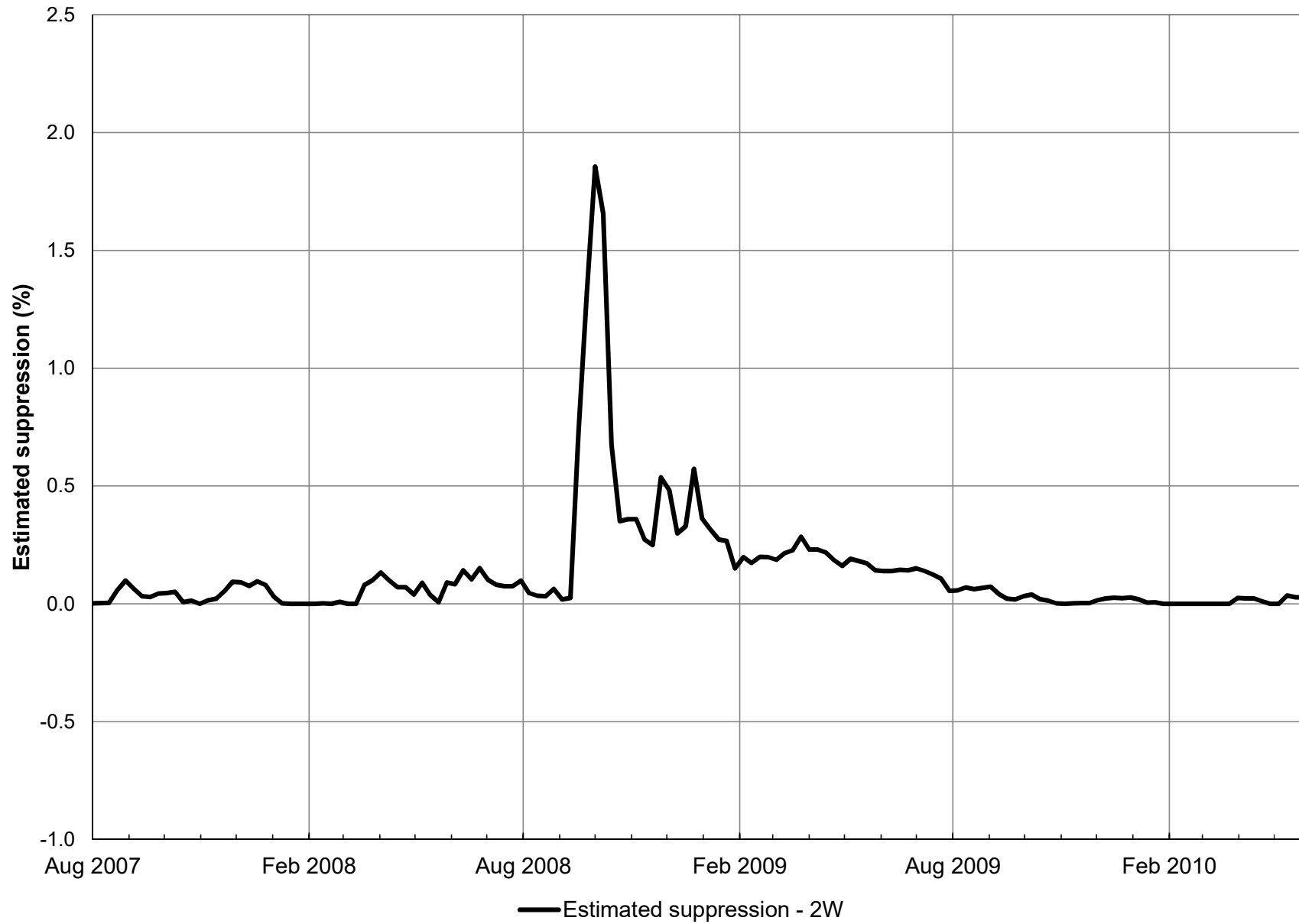
Summary of Estimated Suppression	
USD LIBOR tenor	Average suppression in basis points (Aug 2007 - May 2010)
1W	11
2W	13
1M	19
2M	15
3M	13
4M	18
5M	22
6M	26
7M	28
8M	30
9M	32
10M	34
11M	36
12M	37

The suppression numbers for USD LIBOR tenors other than 1M and 3M are provided for the purposes of the Barclays settlement only and do not reflect the expert opinions of Dr. Bernheim.

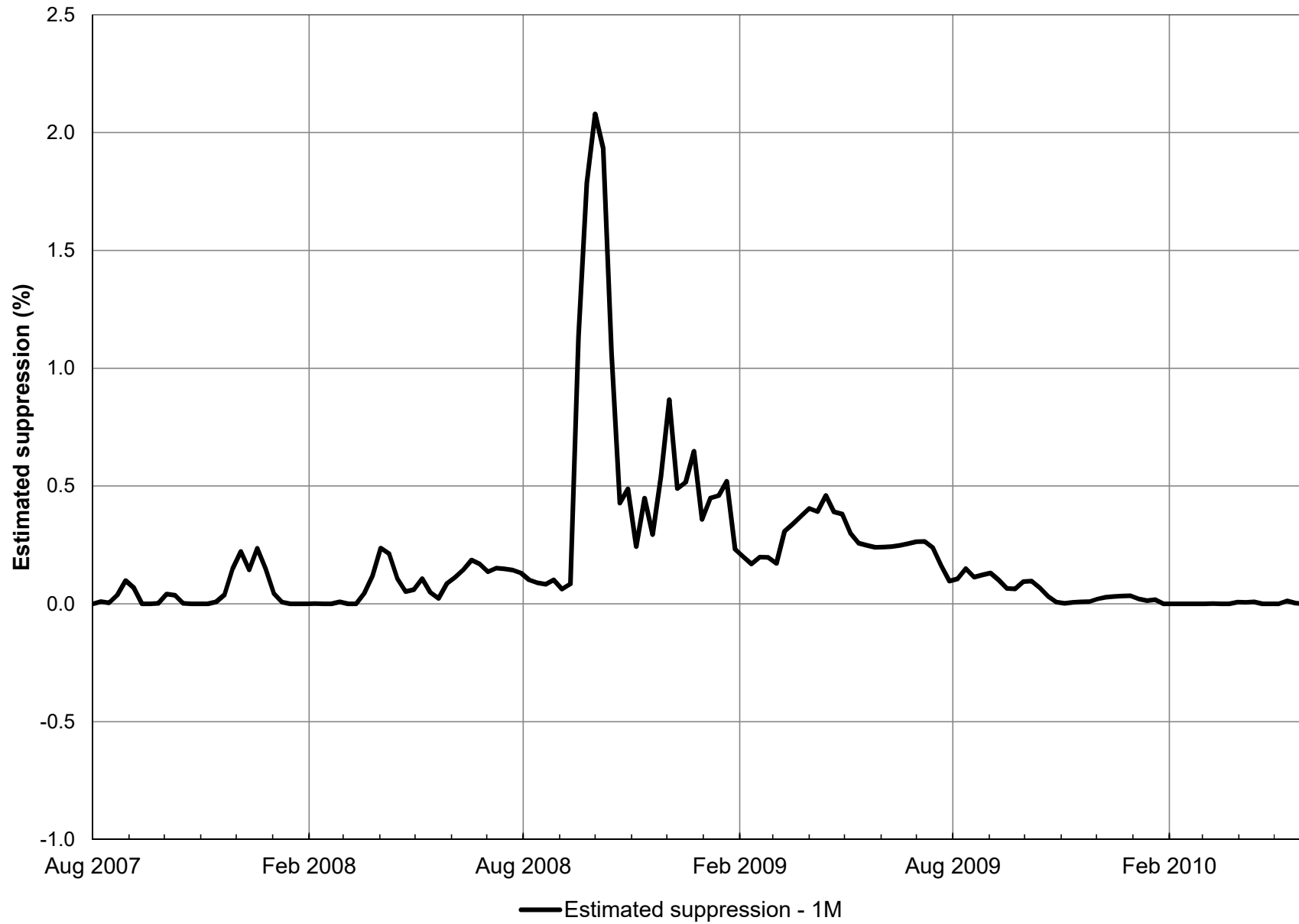
Estimated Suppression for 1W USD LIBOR



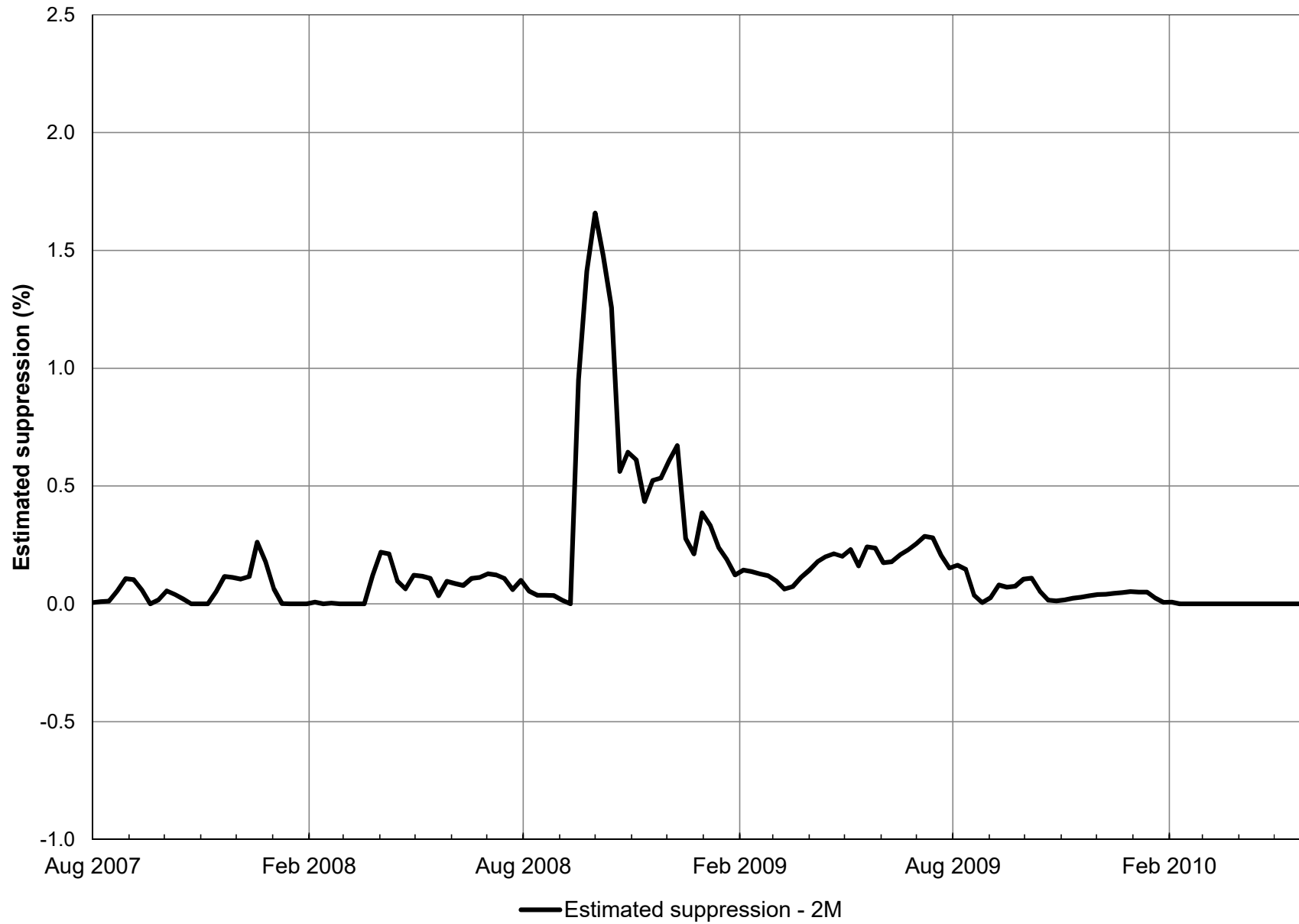
Estimated Suppression for 2W USD LIBOR



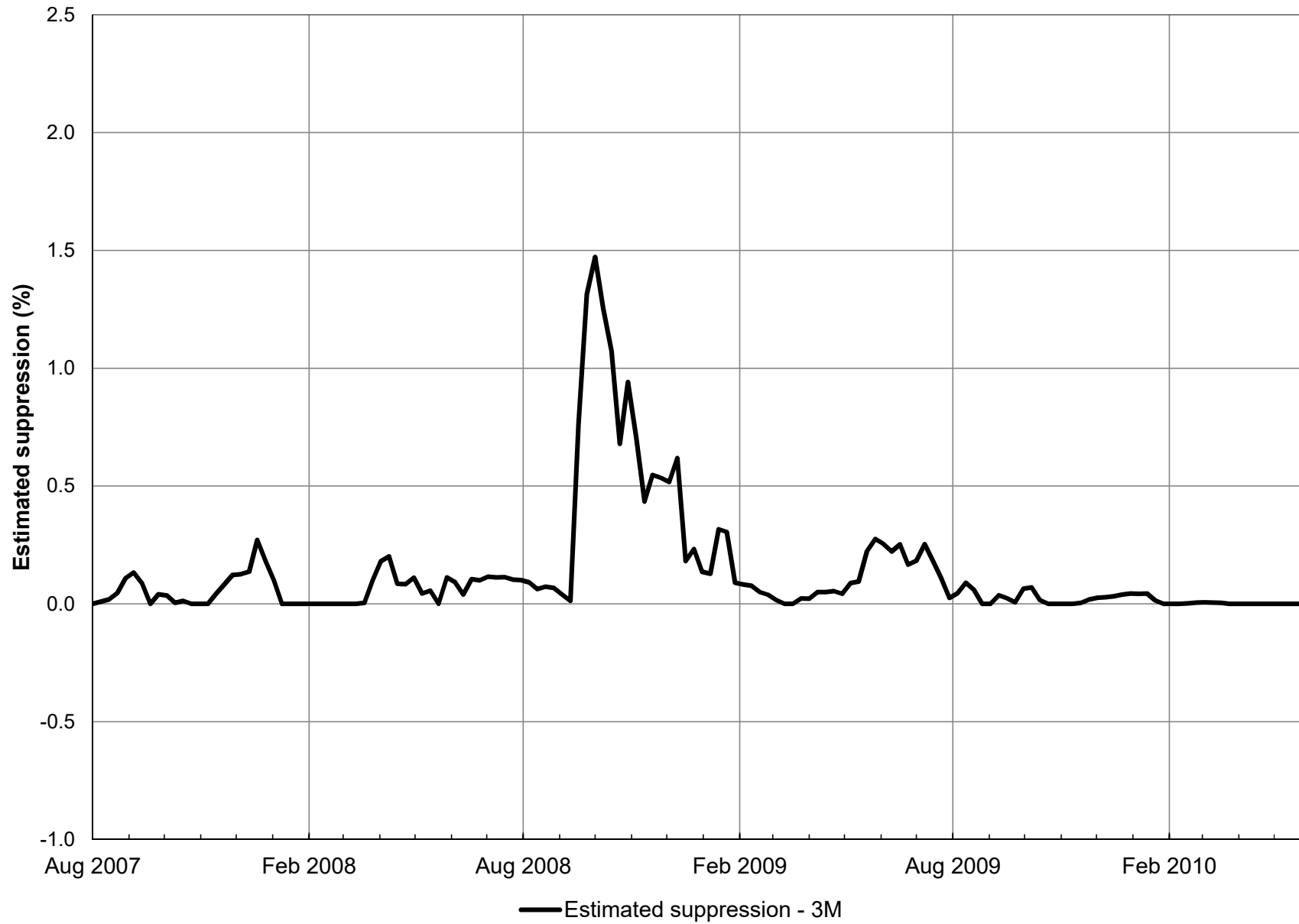
Estimated Suppression for 1M USD LIBOR



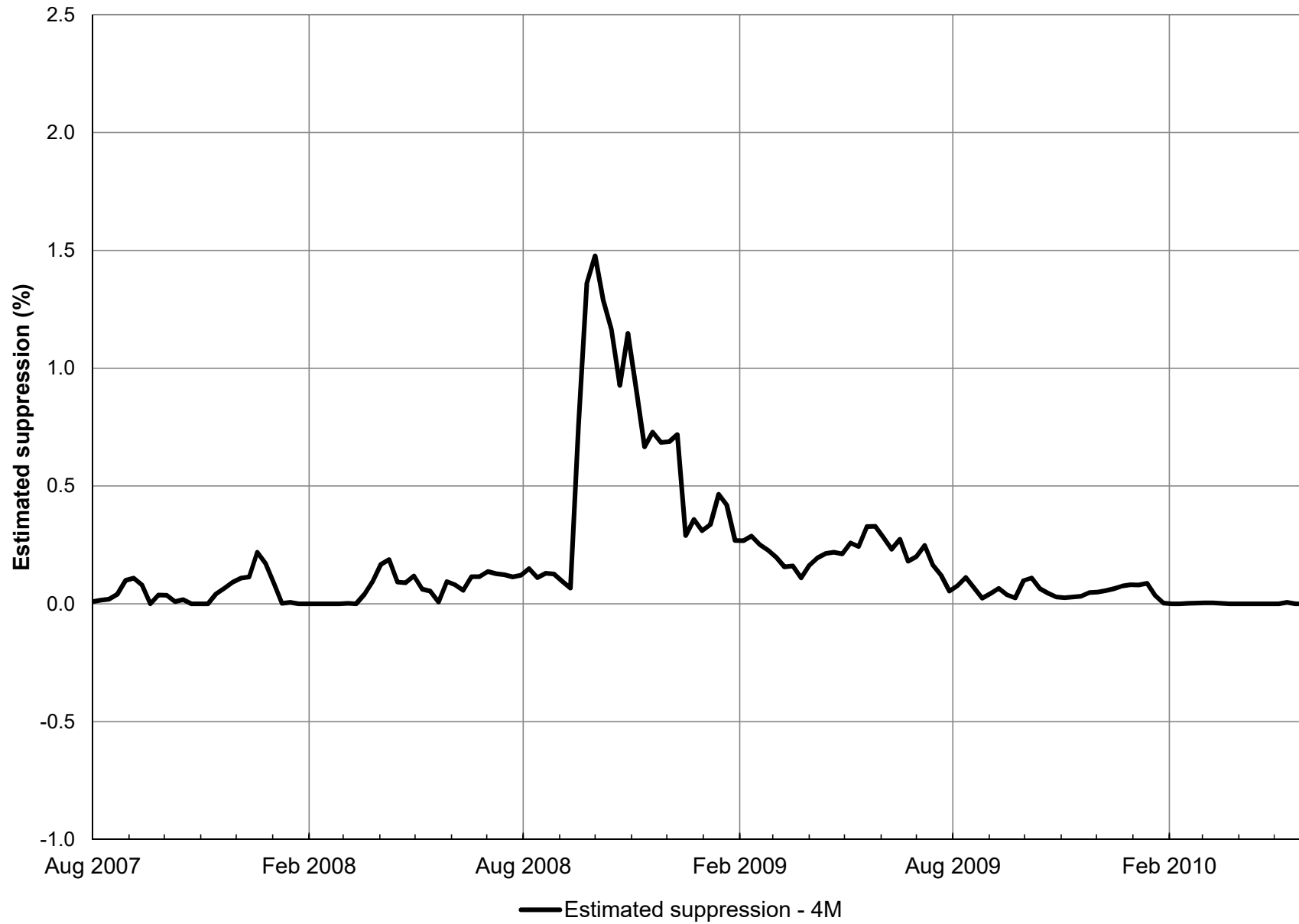
Estimated Suppression for 2M USD LIBOR



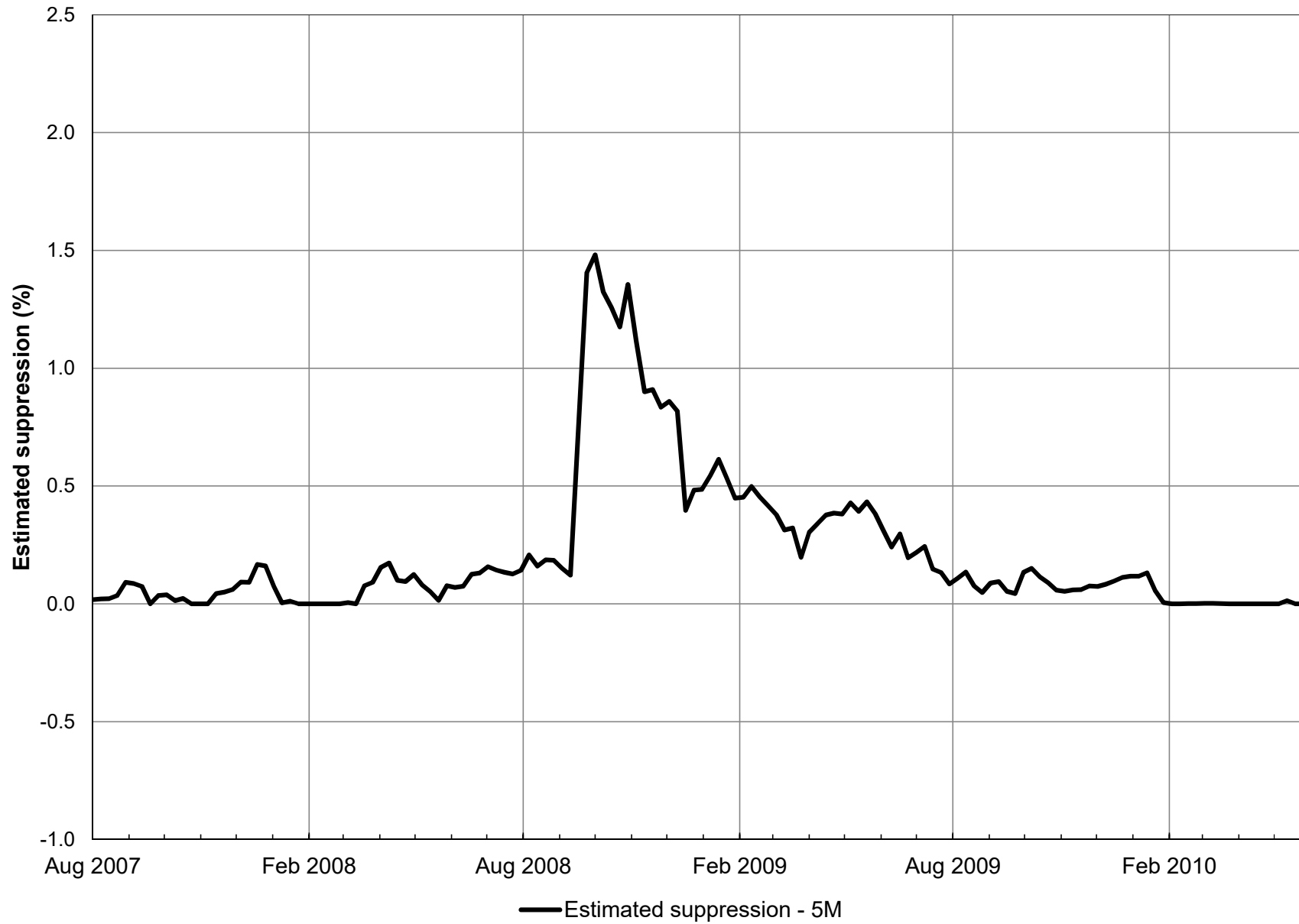
Estimated Suppression for 3M USD LIBOR



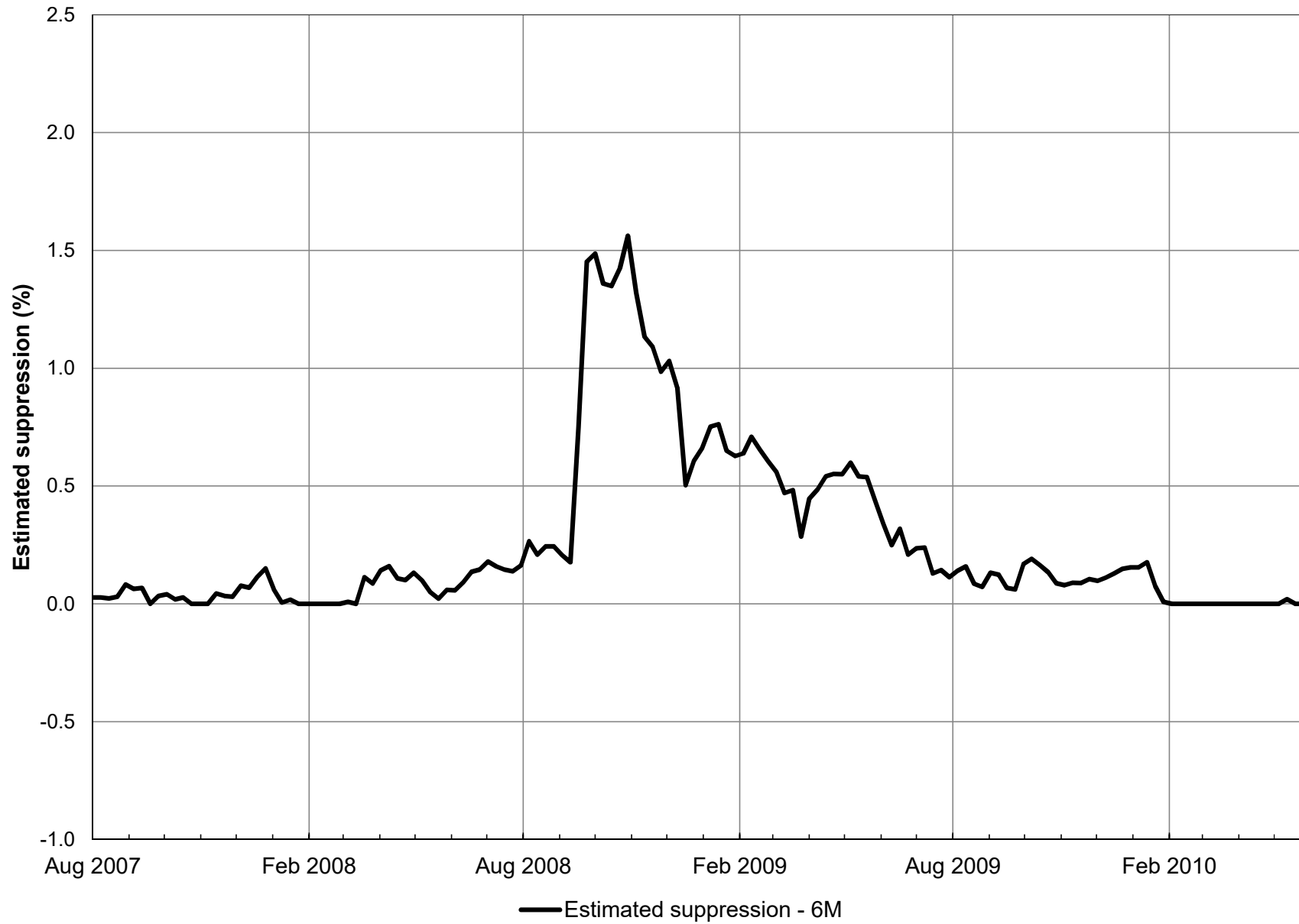
Estimated Suppression for 4M USD LIBOR



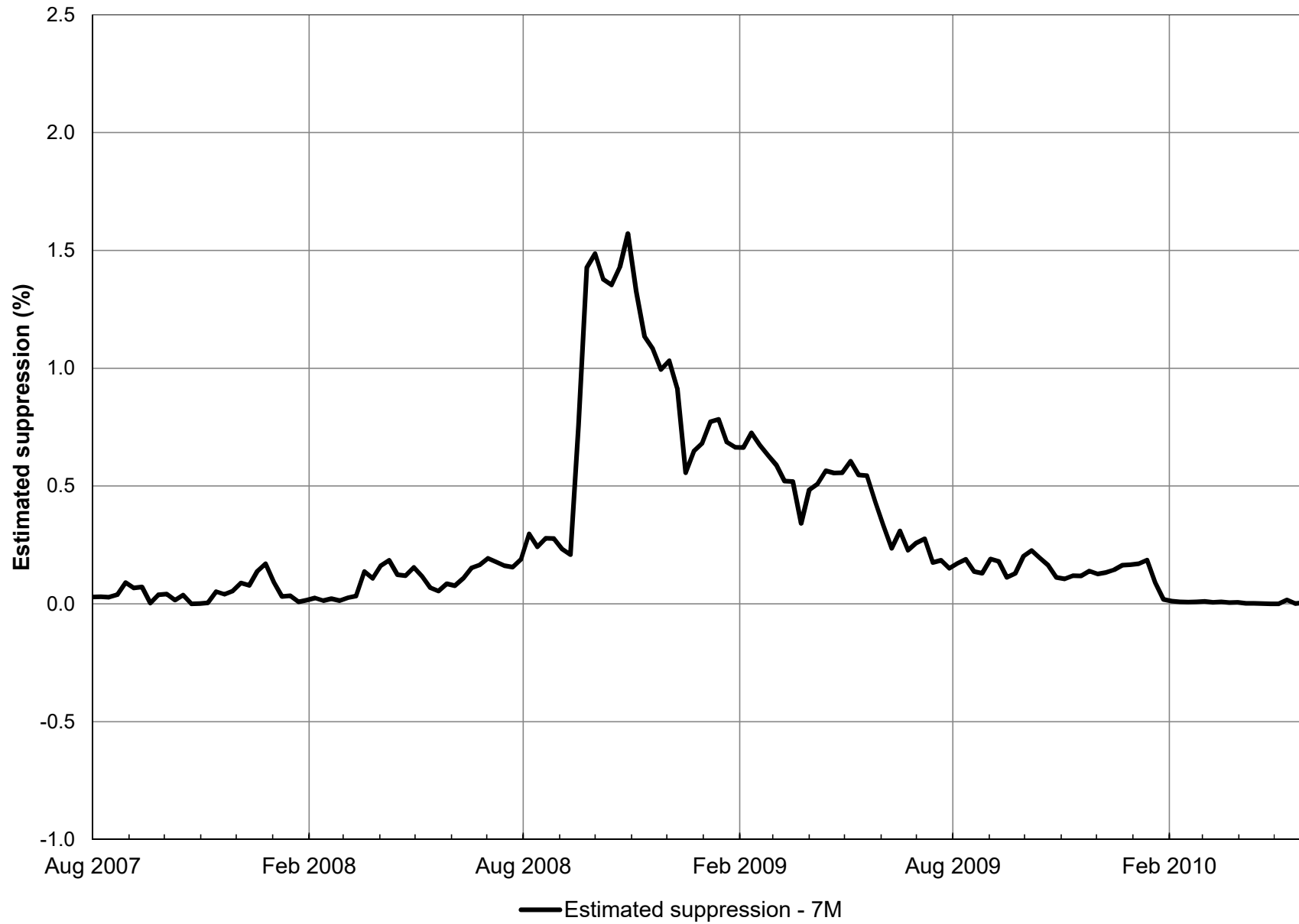
Estimated Suppression for 5M USD LIBOR



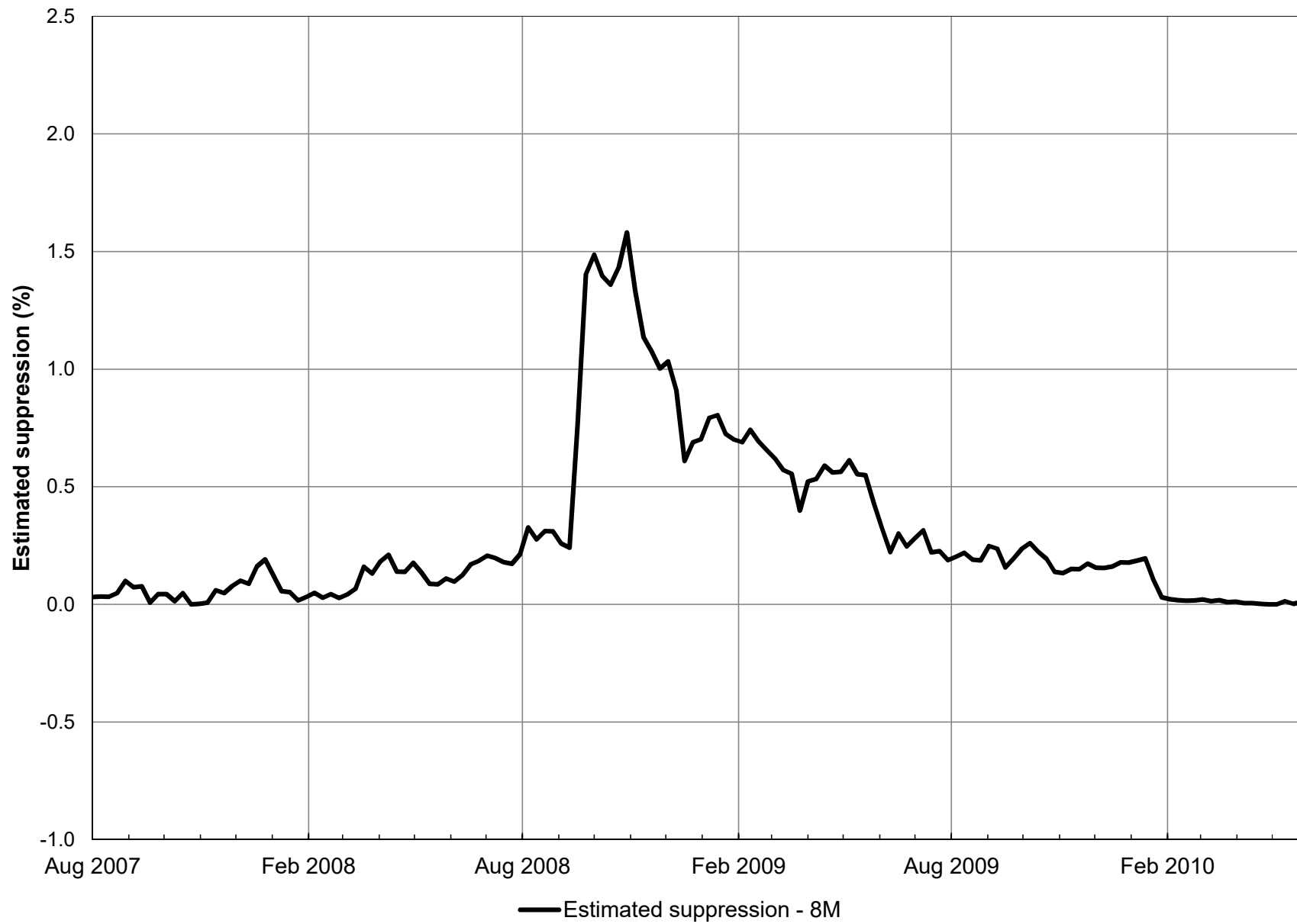
Estimated Suppression for 6M USD LIBOR



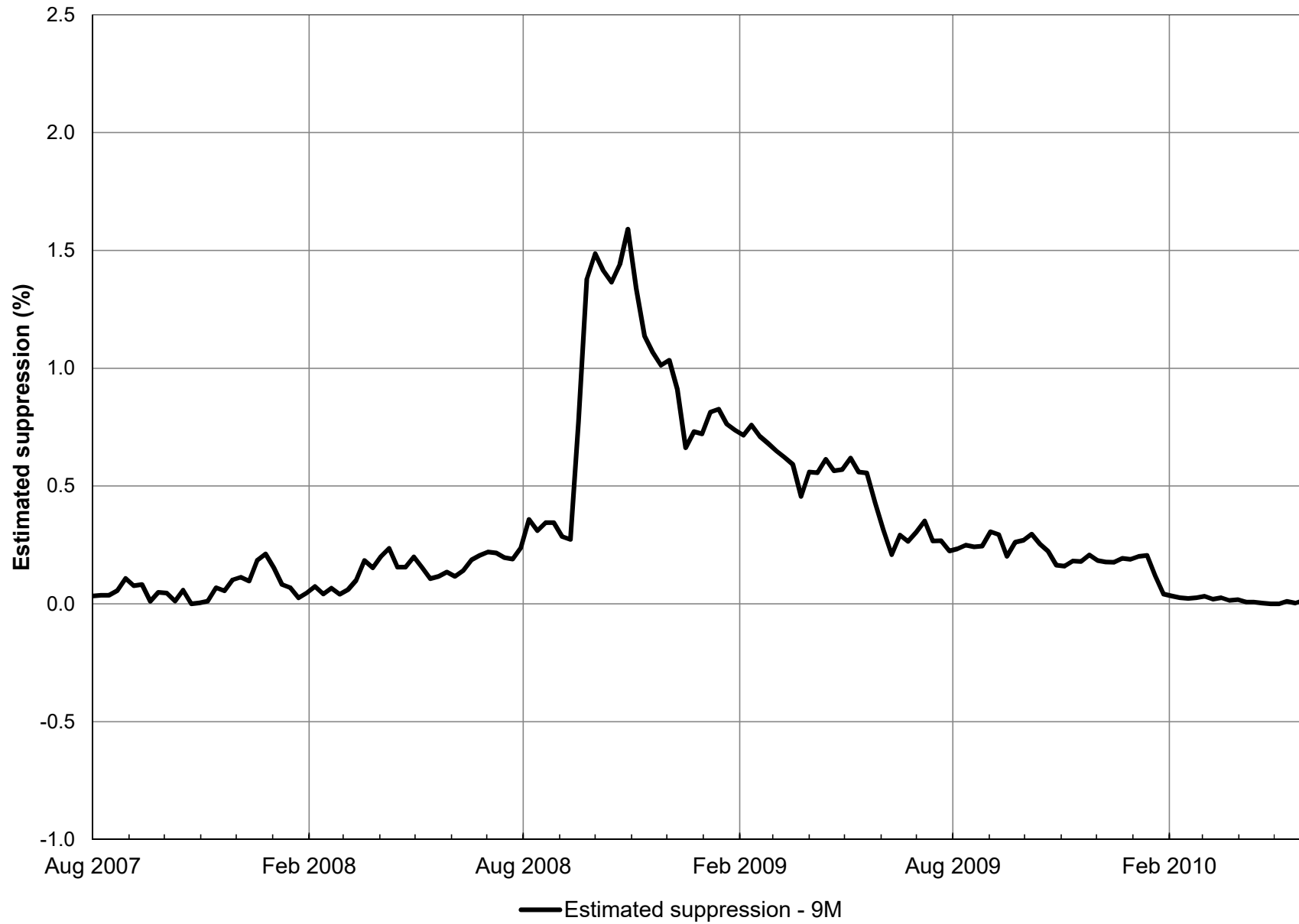
Estimated Suppression for 7M USD LIBOR



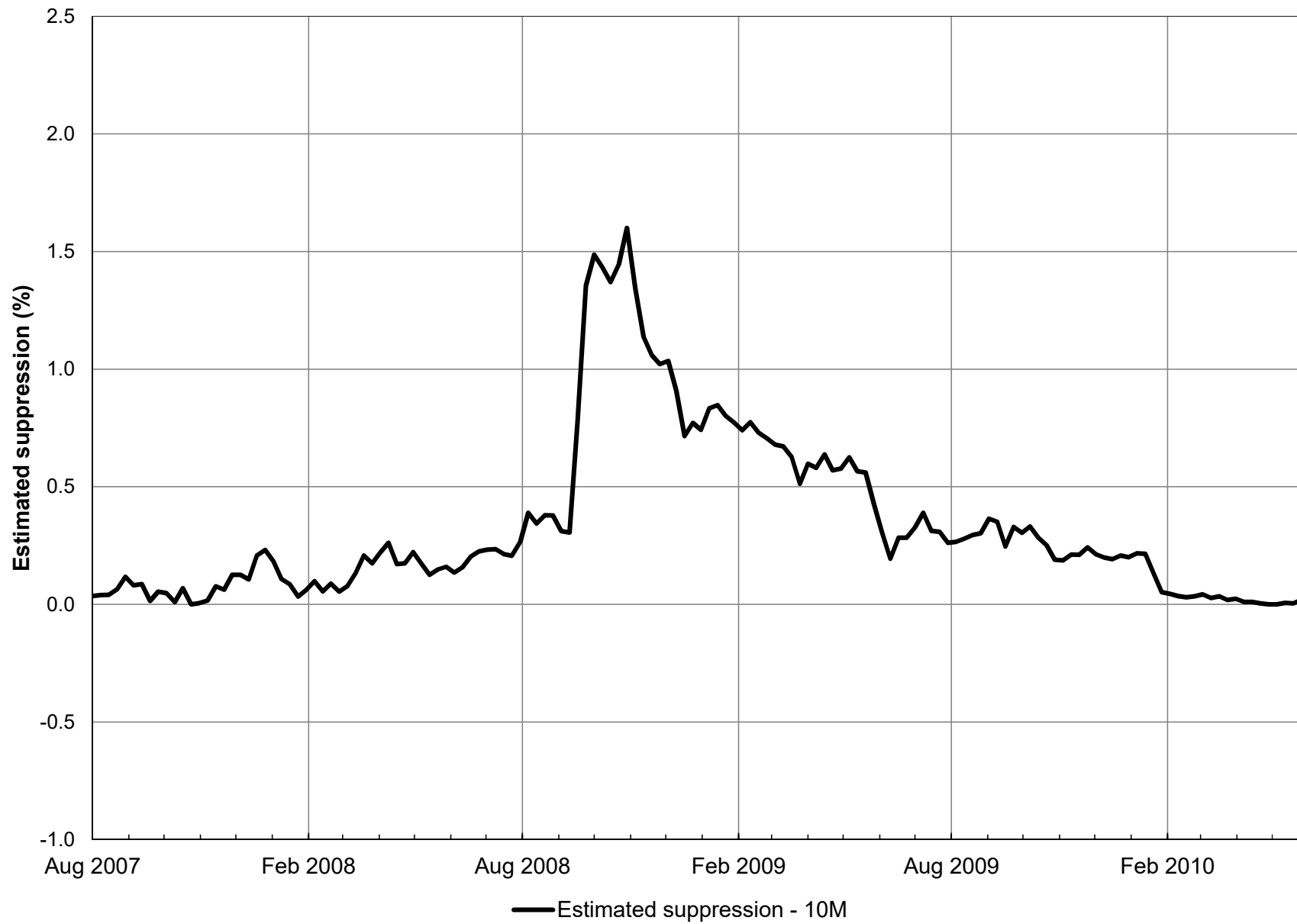
Estimated Suppression for 8M USD LIBOR



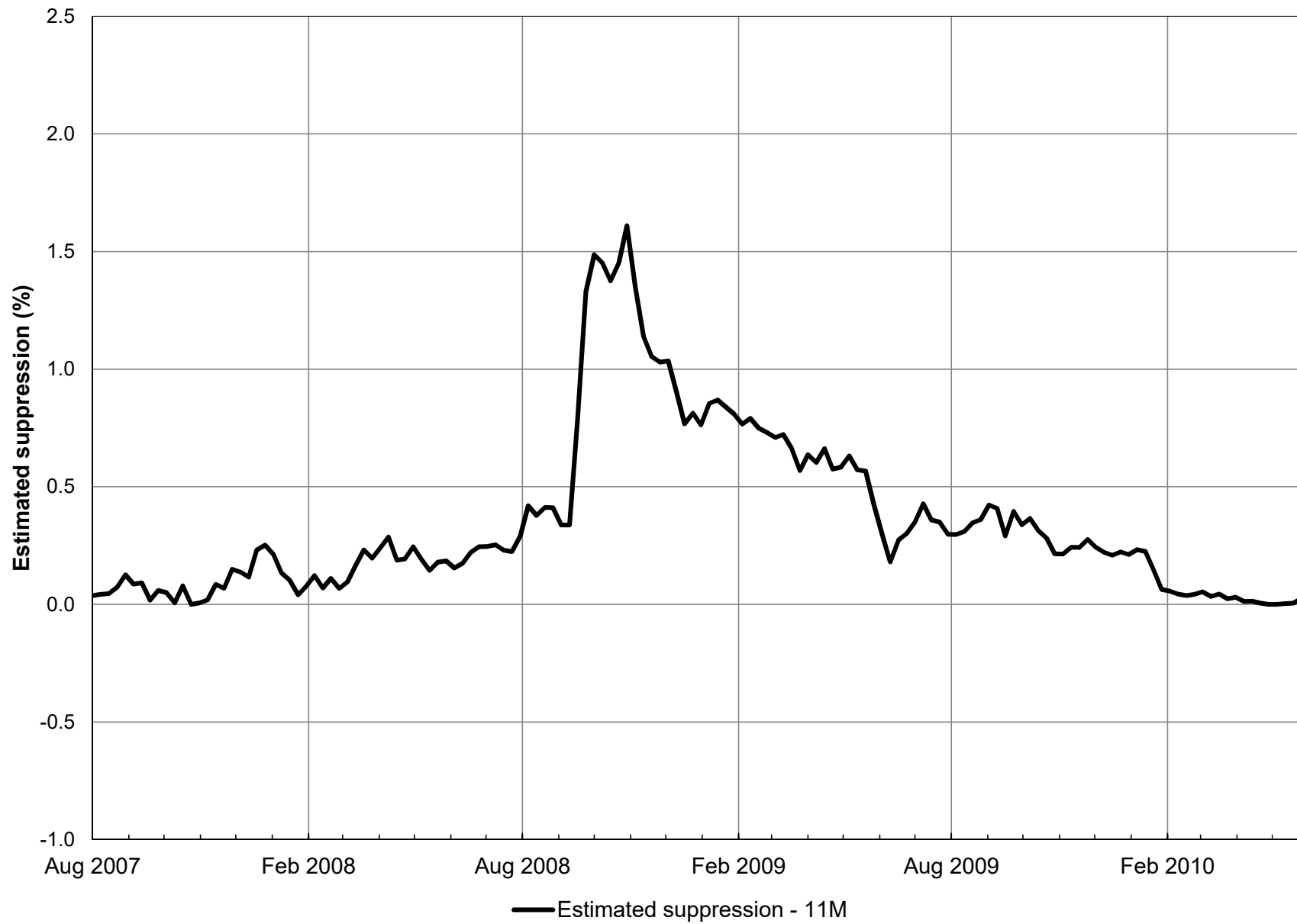
Estimated Suppression for 9M USD LIBOR



Estimated Suppression for 10M USD LIBOR



Estimated Suppression for 11M USD LIBOR



Estimated Suppression for 12M USD LIBOR

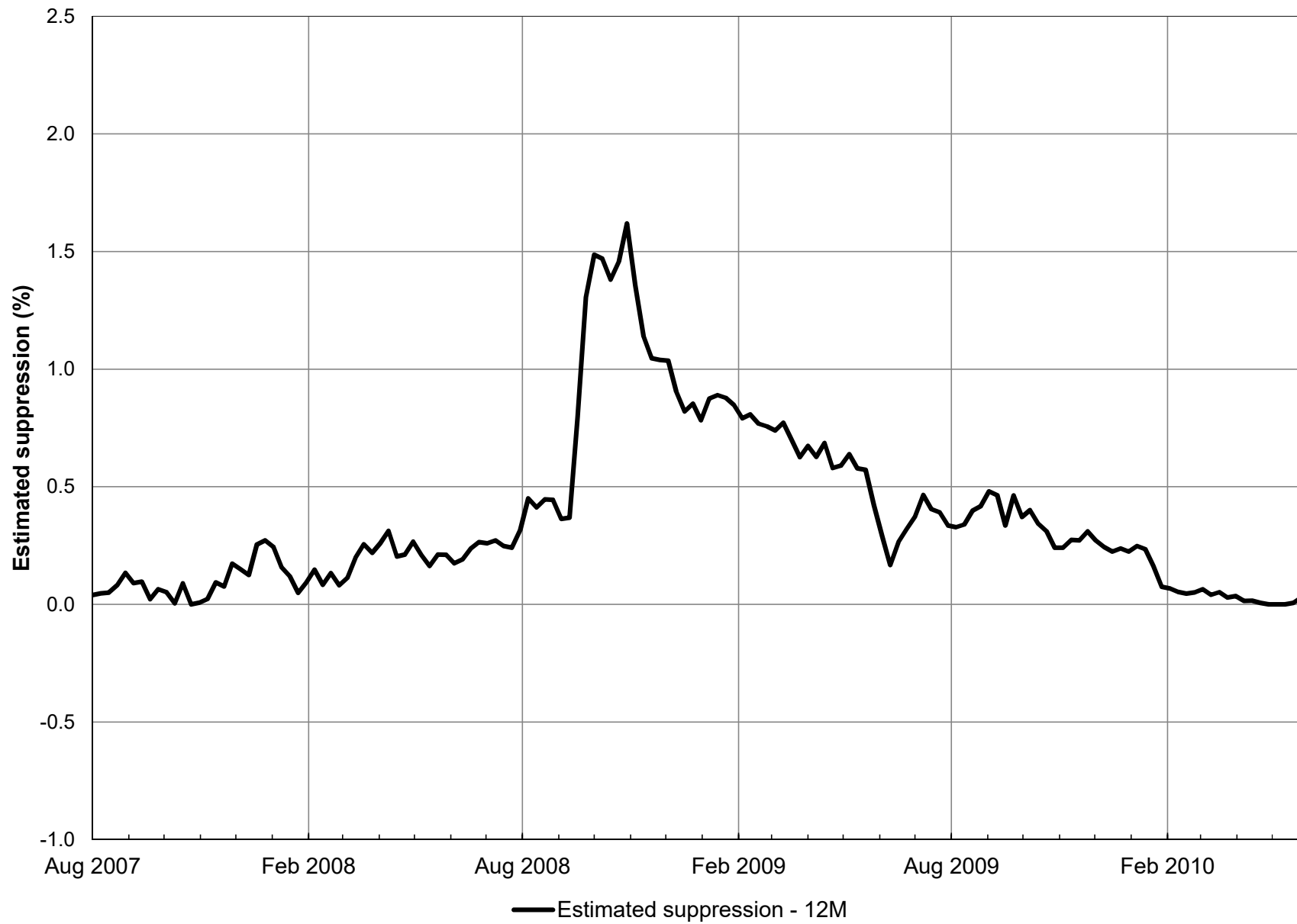


Exhibit D

**Relevant Pages from
BIS Triennial Bank Surveys
for 2007 and 2010**

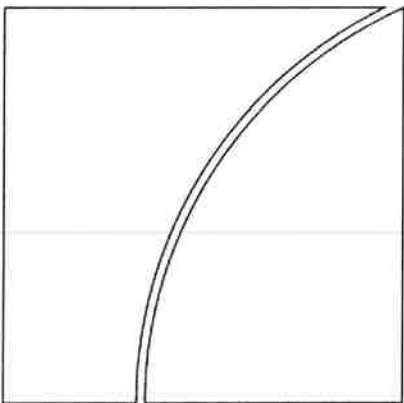


BANK FOR INTERNATIONAL SETTLEMENTS

Triennial Central Bank Survey

December 2007

Foreign exchange and
derivatives market activity
in 2007



**Notional amounts outstanding of OTC single currency interest rate derivatives
by instrument, counterparty and currency at end-June 2007¹**

All currencies

In millions of US dollars

	Total	US dollar	Euro	Yen	Pound sterling
Forward rate agreements	25,607,251	8,928,075	5,512,237	288,580	2,668,040
with reporting dealers	11,982,197	4,185,544	3,060,290	193,183	1,499,862
with other financial institutions	12,398,005	4,396,885	2,359,807	60,585	1,149,431
with other non-financial customers	1,227,047	345,646	92,141	34,814	18,747
Swaps	306,437,541	88,211,157	119,670,596	44,515,139	25,739,385
with reporting dealers	129,949,653	36,887,859	47,970,495	22,537,471	10,626,456
with other financial institutions	135,157,049	36,800,067	57,328,771	16,596,881	11,493,319
with other non-financial customers	41,330,838	14,523,236	14,371,328	5,380,785	3,619,612
Options sold	44,211,453	20,678,500	17,351,385	3,216,250	1,727,381
with reporting dealers	28,708,784	12,551,852	12,111,773	2,413,418	1,006,648
with other financial institutions	10,845,062	5,296,339	4,106,516	542,038	518,937
with other non-financial customers	4,657,605	2,830,307	1,133,096	260,796	201,798
Options bought	40,675,505	18,353,988	16,188,322	3,260,564	1,698,670
with reporting dealers	27,915,959	12,307,997	11,521,279	2,385,600	1,087,942
with other financial institutions	9,328,545	4,026,685	3,873,612	599,719	444,373
with other non-financial customers	3,431,003	2,019,310	793,433	275,245	166,355
Total options	56,574,584	26,602,570	21,723,185	4,077,309	2,378,759
Other products	7,210
Total contracts	388,626,574	123,741,791	146,906,004	48,881,019	30,786,175

For footnotes, see facing page.

Table E.39

**Notional amounts outstanding of OTC single currency interest rate derivatives
by instrument, counterparty and currency at end-June 2007¹**

All currencies

In millions of US dollars

Swiss franc	Canadian dollar	Swedish krona	Other currencies ²	
488,589	88,154	2,928,027	4,705,549	Forward rate agreements
378,558	49,429	1,080,902	1,534,429	with reporting dealers
83,946	29,692	1,482,355	2,835,304	with other financial institutions
26,085	9,034	364,772	335,808	with other non-financial customers
3,520,638	3,175,031	3,387,102	18,218,493	Swaps
1,445,603	1,411,219	1,000,473	8,070,077	with reporting dealers
1,640,964	1,349,508	1,870,358	8,077,181	with other financial institutions
434,070	414,302	516,270	2,071,235	with other non-financial customers
130,808	182,555	134,724	789,850	Options sold
59,550	86,643	39,744	439,156	with reporting dealers
43,245	73,345	32,738	231,904	with other financial institutions
28,015	22,567	62,242	118,784	with other non-financial customers
119,566	173,617	142,577	738,201	Options bought
65,095	92,036	31,430	424,580	with reporting dealers
44,291	61,755	38,497	239,613	with other financial institutions
10,180	19,826	72,651	74,003	with other non-financial customers
188,056	266,835	241,712	1,096,158	Total options
***	***	***	7,210	Other products
4,197,279	3,530,018	6,556,836	24,027,452	Total contracts

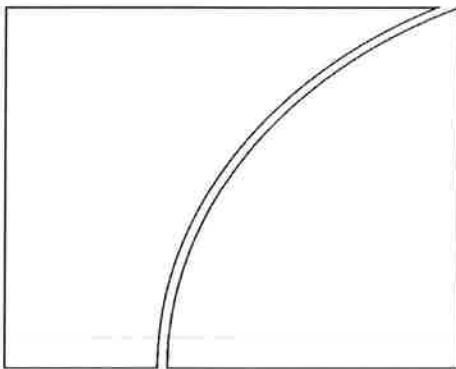
¹ Data adjusted for inter-dealer double-counting. While data on total options are shown on a net basis, separate data on options sold and options bought are recorded on a gross basis, ie not adjusted for inter-dealer double-counting. ² Calculated as the difference between the total and the sum of the listed components.

Table E.39 (cont)



BANK FOR INTERNATIONAL SETTLEMENTS

Triennial Central Bank Survey



Foreign exchange and
derivatives market activity in
2010

AMOUNTS OUTSTANDING

**Notional amounts outstanding of OTC single currency interest rate derivatives
by instrument, counterparty and currency at end-June 2010¹**

All currencies

In millions of US dollars

	Total	US dollar	Euro	Yen	Pound sterling
Forward rate agreements	60,028,187	29,736,659	17,334,587	169,613	5,239,272
with reporting dealers	32,078,754	18,366,760	8,012,814	94,716	2,314,062
with other financial institutions	25,459,541	9,786,408	8,797,296	63,346	2,863,755
with non-financial customers	2,489,894	1,583,493	524,476	11,552	61,454
Swaps	367,540,841	123,551,791	128,933,539	51,182,501	29,479,751
with reporting dealers	87,819,275	26,995,306	26,542,971	17,631,169	5,374,350
with other financial institutions	245,139,206	85,822,383	91,290,797	27,535,547	20,579,124
with non-financial customers	34,582,366	10,734,102	11,099,772	6,015,782	3,526,276
Options sold	37,381,952	11,780,745	17,836,599	3,545,322	2,307,018
with reporting dealers	22,742,085	6,542,004	11,418,695	2,634,681	1,178,070
with other financial institutions	12,196,632	4,151,034	5,598,311	800,226	981,695
with non-financial customers	2,443,233	1,087,706	819,595	110,414	147,254
Options bought	36,136,239	11,403,431	17,353,181	3,262,533	2,417,618
with reporting dealers	23,256,734	7,009,750	11,605,444	2,521,496	1,224,001
with other financial institutions	11,220,791	3,807,546	5,140,025	681,464	1,060,397
with non-financial customers	1,658,715	586,134	607,709	59,575	133,221
Total options	50,518,782	16,408,305	23,677,714	4,229,767	3,523,602
Other products	4,997
Total contracts	478,092,807	169,696,755	169,945,840	55,581,881	38,242,625

For footnotes, see facing page.

Table 2

Exhibit E

**Pertinent Pages from
Relevant OCC Reports
for Each Quarter
During the Class Period**

OCC'S Quarterly Report on Bank Derivatives Activities
Third Quarter 2007

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq307.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Derivatives Activities Third Quarter 2007

Executive Summary

- U.S. commercial banks generated \$2.3 billion in revenues trading cash and derivative instruments in the third quarter of 2007, down 62% from the \$6.2 billion reported in the second quarter. This decline is attributed largely to the difficult trading environment in credit markets.
- Net Current Credit Exposure increased \$53 billion, or 27% from the prior quarter, to \$252 billion.
- The notional amount of derivatives held by U.S. commercial banks increased \$19.7 trillion to \$172.2 trillion in the third quarter, 13% higher than in the second quarter. Bank derivative contracts remain concentrated in interest rate products, which represent 81% of total notionals.
- The notional amount of credit derivatives, the fastest growing product in the derivatives market, increased 19% from the second quarter to \$14 trillion. Credit default swaps represent 98% of the total amount of credit derivatives.

The OCC's quarterly report on bank derivatives activities and trading revenues is based on Call Report information provided by all insured U.S. commercial banks and trust companies, as well as on other published financial data.

Derivatives activity in the U.S. banking system is dominated by a small group of large financial institutions. Five large commercial banks represent 97% of the total industry notional amount, 78% of total trading revenues and 87% of industry net current credit exposure.

While bank supervisors normally have concerns about market or product concentrations, there are three important mitigating factors with respect to derivatives activities. First, there are a number of other providers of derivatives products, such as investment banks and foreign banks, whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is appropriately concentrated in those institutions that have made the resource commitment to be able to operate this business in a safe and sound manner. Third, the OCC has examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation and compliance risks of derivatives activities.

Revenues

Trading revenues from cash instruments and derivative products totaled \$2.3 billion in the third quarter of 2007 for all insured U.S. commercial banks (see table below), down 62% from the near-record level of \$6.2 billion in the second quarter of 2007.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
SEPTEMBER 30, 2007, \$ MILLIONS
NOTE: DATA ARE PRELIMINARY**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT DERIVATIVES (OTC)	SPOT FX
1	JPMORGAN CHASE & CO.	NY	\$1,479,575	\$92,304,005	\$1,551,702	\$3,207,451	\$5,761,110	\$61,467,636	\$12,541,630	\$7,774,476	\$7,774,476	\$295,174
2	CITIGROUP INC.	NY	2,358,266	39,451,849	860,520	4,653,371	3,989,610	19,655,355	6,758,066	3,534,927	3,534,927	333,905
3	BANK OF AMERICA CORPORATION	NC	1,582,330	32,733,343	956,137	820,760	2,925,194	22,946,420	3,528,758	1,556,073	1,556,073	196,657
4	WACHOVIA CORPORATION	NC	754,168	5,137,123	330,226	544,780	112,455	3,075,761	678,291	395,610	395,610	21,156
5	HSBC NORTH AMERICA HOLDINGS INC.	IL	509,866	4,425,904	119,043	116,906	375,399	2,102,767	574,307	1,137,483	1,137,483	58,576
6	TAUNUS CORPORATION	NY	600,740	1,121,667	115,792	257,732	525,046	177,086	27,668	18,343	18,343	703
7	BANK OF NEW YORK MELLON CORPORATION, THE	NY	184,166	1,107,709	72,905	25,572	257,520	381,168	368,296	2,248	2,248	43,893
8	WELLS FARGO & COMPANY	CA	548,727	992,529	112,485	85,844	424,615	291,396	75,810	2,379	2,379	18,580
9	STATE STREET CORPORATION	MA	140,085	799,021	333	0	744,023	10,173	44,265	228	228	40,885
10	SUNTRUST BANKS, INC.	GA	175,857	263,913	92,346	10,106	31,731	102,552	26,103	1,075	1,075	824
11	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	131,478	256,758	44,692	25,038	5,309	128,458	47,997	5,264	5,264	2,362
12	METLIFE, INC.	NY	563,077	187,965	13,051	0	7,560	74,500	86,168	6,687	6,687	0
13	NORTHERN TRUST CORPORATION	IL	63,099	152,933	0	0	144,596	7,505	561	271	271	15,939
14	KEYCORP	OH	96,830	119,418	16,646	0	11,265	74,956	8,306	8,245	8,245	1,519
15	NATIONAL CITY CORPORATION	OH	154,176	112,385	12,426	1,325	19,764	31,514	45,379	1,977	1,977	676
16	BARCLAYS GROUP US INC.	DE	435,586	104,672	40,699	0	22,254	24,643	10,845	6,230	6,230	0
17	U.S. BANCORP	MIN	227,628	89,512	6,950	9,330	17,019	47,460	7,937	816	816	379
18	ABN AMRO NORTH AMERICA HOLDING COMPANY	IL	109,063	75,745	0	0	15	52,566	13,209	9,955	9,955	0
19	CITIZENS FINANCIAL GROUP, INC.	RI	164,201	61,567	0	0	3,732	56,682	993	160	160	80
20	REGIONS FINANCIAL CORPORATION	AL	138,237	52,929	5,929	2,000	1,270	38,639	4,915	175	175	28
21	FIFTH THIRD BANCORP	OH	104,265	49,351	39	0	5,787	32,335	10,804	386	386	372
22	BB&T CORPORATION	NC	130,781	43,022	7,136	0	8,000	22,022	5,737	128	128	29
23	CAPITAL ONE FINANCIAL CORPORATION	VA	147,155	41,433	0	0	829	40,503	101	0	0	0
24	FIRST HORIZON NATIONAL CORPORATION	TN	37,480	33,669	7,197	0	6,943	9,587	9,942	0	0	3
25	UNIONBANCAL CORPORATION	CA	54,343	27,986	0	0	4,392	15,595	7,999	0	0	1,588
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			\$10,891,180	\$179,746,410	\$4,366,253	\$9,760,215	\$15,405,439	\$110,867,280	\$24,884,087	\$14,463,135	\$14,463,135	\$1,033,327

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
SEPTEMBER 30, 2007, \$ MILLIONS
NOTE: DATA ARE PRELIMINARY

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,244,049	\$91,734,451	4.8	95.2	82.0	6.6	3.0	8.5
2	CITIBANK NATIONAL ASSN	NV	1,233,325	34,004,072	2.9	97.1	76.5	13.6	1.0	8.9
3	BANK OF AMERICA NA	NC	1,290,376	32,074,527	5.0	95.0	85.0	8.7	1.4	4.9
4	WACHOVIA BANK NATIONAL ASSN	NC	557,018	5,165,545	16.9	83.1	87.2	2.8	2.2	7.8
5	HSBC BANK USA NATIONAL ASSN	DE	181,811	4,439,684	4.2	95.8	57.5	14.7	2.0	25.7
6	WELLS FARGO BANK NA	SD	445,446	991,484	19.8	80.2	93.5	4.6	1.6	0.2
7	BANK OF NEW YORK	NY	112,524	953,577	9.3	90.7	81.2	17.1	1.4	0.2
8	STATE STREET BANK&TRUST CO	MA	131,321	799,571	0.0	100.0	2.2	97.8	0.0	0.0
9	SUNTRUST BANK	GA	171,511	264,514	38.7	61.3	93.1	2.9	3.6	0.4
10	PNC BANK NATIONAL ASSN	PA	119,504	260,331	26.5	73.5	92.7	4.5	0.7	2.1
11	MELLON BANK NATIONAL ASSN	PA	32,183	181,823	5.1	94.9	20.4	78.5	1.0	0.1
12	NORTHERN TRUST CO	IL	54,113	152,959	0.0	100.0	2.9	96.8	0.0	0.2
13	KEYBANK NATIONAL ASSN	OH	93,178	116,094	14.3	85.7	79.9	12.7	0.3	7.1
14	NATIONAL CITY BANK	OH	141,885	114,673	12.0	88.0	95.6	2.7	0.0	1.7
15	U S BANK NATIONAL ASSN	OH	225,976	85,751	19.0	81.0	89.1	9.9	0.1	1.0
16	LASALLE BANK NATIONAL ASSN	IL	73,157	60,634	0.0	100.0	94.3	0.0	1.8	3.8
17	MERRILL LYNCH BANK USA	IL	77,649	58,886	45.5	54.5	81.5	1.6	3.2	13.7
18	REGIONS BANK	AL	133,921	51,559	15.4	84.6	98.9	0.7	0.0	0.3
19	RBS CITIZENS NATIONAL ASSN	RI	132,409	49,820	0.0	100.0	92.4	7.3	0.0	0.3
20	FIFTH THIRD BANK	OH	57,199	47,061	0.1	99.9	75.6	23.0	0.8	0.5
21	BRANCH BANKING&TRUST CO	NC	126,290	46,455	14.7	85.3	99.3	0.4	0.0	0.3
22	FIRST TENNESSEE BANK NA	TN	37,158	33,269	21.6	78.4	100.0	0.0	0.0	0.0
23	LEHMAN BROTHERS COMI BK	UT	6,343	29,982	0.0	100.0	100.0	0.0	0.0	0.0
24	UNION BANK OF CALIFORNIA NA	CA	53,685	28,386	0.0	100.0	68.5	20.8	10.7	0.0
25	DEUTSCHE BANK TR CO AMERICAS	NY	36,215	26,337	0.0	100.0	44.4	6.1	27.4	22.2
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES					\$8,554,321	\$163,217,123	\$138,433,821	\$15,579,655	\$3,786,887	\$13,971,081
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES					13,040	390,848	342,721	30,611	12,422	18,135
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES					8,567,361	163,607,971	138,776,541	15,610,266	3,799,309	13,989,216
TOP 25 COMMERCIAL BANKS & TC: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					99.8	94.8	80.4	9.0	2.2	8.1
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					100.0	95.0	80.6	9.1	2.2	8.1

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Before the first quarter of 1995 total derivatives included spot foreign exchange. Beginning in the first quarter, 1995, spot foreign exchange was reported separately.

Note: Numbers may not add due to rounding.

Data source: Call Reports, schedule RC-1

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
Fourth Quarter 2007

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq407.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities Fourth Quarter 2007

Executive Summary

- Fourth quarter 2007 trading in cash and derivative instruments resulted in losses of \$9.97 billion for U.S. commercial banks, compared to revenues of \$2.3 billion in the third quarter of 2007. The loss reflects a continuation and deepening of the turmoil in capital markets that began in the third quarter, particularly for credit instruments.
- For fiscal year 2007, U.S. commercial banks reported trading revenues of \$5.5 billion, compared to record revenues of \$18.8 billion in 2006. The weaker 2007 revenues resulted from poor trading results in the second half of 2007.
- Net current credit exposure increased 22% to \$309 billion from the third quarter, and is 67% higher than at the end of 2006. The rapid increase in credit exposure results from sharply lower interest rates and higher credit spreads, which created a large increase in derivatives receivables.
- The notional value of derivatives held by U.S. commercial banks decreased \$8 trillion, or 5 percent, to \$164.2 trillion in the fourth quarter. The decline in notional values, while unusual, is not surprising given the current turmoil in global capital markets.
- Derivative contracts remain concentrated in interest rate products, which comprise 79% of total derivative notional value. The notional value of credit derivative contracts increased 3% during the quarter to \$14.4 trillion, with 98% of those contracts being credit default swaps.

The OCC's quarterly report on bank derivatives activities and trading revenues is based on Call Report information provided by all insured U.S. commercial banks and trust companies, as well as on other published financial data.

Derivatives activity in the U.S. banking system is dominated by a small group of large financial institutions. Five large commercial banks represent 97% of the total industry notional amount and 87% of industry net current credit exposure.

While bank supervisors normally have concerns about market or product concentrations, there are three important mitigating factors with respect to derivatives activities. First, there are a number of other providers of derivatives products, such as investment banks and foreign banks, whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is appropriately concentrated in those institutions that have made the resource commitment to be able to operate this business in a safe and sound manner. Third, the OCC has examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation and compliance risks of derivatives activities.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
DECEMBER 31, 2007, \$ MILLIONS
NOTE: DATA ARE PRELIMINARY**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT	SPOT FX
1	JPMORGAN CHASE & CO.	NY	\$1,562,147	\$84,866,696	\$1,719,992	\$2,490,096	\$6,415,512	\$53,840,066	\$12,435,166	\$7,965,864		\$40,312
2	CITIGROUP INC.	NY	2,187,631	36,842,165	797,876	3,447,707	4,127,874	18,262,460	6,531,455	3,674,793		212,138
3	BANK OF AMERICA CORPORATION	NC	1,720,688	32,713,020	1,009,831	652,106	3,099,962	23,048,753	3,300,029	1,602,339		113,601
4	WACHOVIA CORPORATION	NC	782,896	4,912,529	259,399	310,826	228,947	3,057,972	621,564	433,821		12,496
5	HSBC NORTH AMERICA HOLDINGS INC.	IL	487,755	4,185,861	101,873	22,067	388,186	2,015,347	408,947	1,249,441		40,184
6	BANK OF NEW YORK MELLON CORPORATION, THE	NY	197,839	1,099,391	69,799	19,519	287,773	367,289	352,523	2,488		31,078
7	TAUNUS CORPORATION	NY	668,199	1,078,666	114,423	269,117	449,872	207,775	21,135	16,344		231
8	WELLS FARGO & COMPANY	CA	575,442	1,016,820	91,226	12,760	503,968	310,179	95,935	2,752		21,531
9	STATE STREET CORPORATION	MA	142,937	782,210	957	2,245	714,302	15,202	49,266	238		17,711
10	SUNTRUST BANKS, INC.	GA	179,574	301,494	126,149	6,117	25,207	115,938	26,905	1,177		446
11	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	138,976	281,459	48,697	39,429	5,154	132,159	50,196	5,823		706
12	METLIFE, INC.	NY	558,563	215,982	11,484	0	8,802	87,837	101,009	6,850		0
13	NORTHERN TRUST CORPORATION	IL	67,611	139,270	0	0	129,903	8,518	570	279		21,995
14	KEYCORP	OH	99,567	125,825	19,578	0	11,384	78,857	7,906	8,100		458
15	NATIONAL CITY CORPORATION	OH	150,384	110,144	7,313	1,175	21,604	32,742	45,072	2,238		349
16	U.S. BANCORP	MN	237,615	97,713	10,660	7,000	20,582	50,257	8,160	1,054		442
17	BARCLAYS GROUP US INC.	DE	342,013	85,047	26,011	0	26,072	23,849	4,365	4,750		0
18	CITIZENS FINANCIAL GROUP, INC.	RI	160,286	66,376	0	0	4,133	60,954	1,044	245		72
19	REGIONS FINANCIAL CORPORATION	AL	141,044	54,976	6,140	2,000	1,269	41,172	4,192	202		6
20	FIFTH THIRD BANCORP	OH	110,962	53,187	27	0	6,542	35,762	10,368	487		802
21	BB&T CORPORATION	NC	132,618	47,163	8,690	0	5,137	27,657	5,497	182		34
22	CAPITAL ONE FINANCIAL CORPORATION	VA	150,590	41,730	0	0	1,066	40,664	0	0		0
23	FIRST HORIZON NATIONAL CORPORATION	TN	37,017	36,593	7,099	0	9,263	12,125	8,106	0		2
24	UNIONBANCAL CORPORATION	CA	55,728	29,411	0	0	4,292	15,821	9,298	0		1,153
25	TD BANKNORTH INC.	ME	60,165	24,848	0	0	12,660	7,901	4,287	0		29
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			\$10,948,247	\$169,208,574	\$4,437,223	\$7,282,164	\$16,509,467	\$101,897,258	\$24,102,996	\$14,979,466		\$515,778

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
DECEMBER 31, 2007, \$ MILLIONS
NOTE: DATA ARE PRELIMINARY

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,318,888	\$84,789,323	5.0	95.0	79.8	7.8	3.1	9.3
2	CITIBANK NATIONAL ASSN	NV	1,251,715	33,333,079	2.2	97.8	74.6	15.1	0.9	9.5
3	BANK OF AMERICA NA	NC	1,312,794	32,091,619	4.6	95.4	85.4	8.4	1.1	5.0
4	WACHOVIA BANK NATIONAL ASSN	NC	653,269	4,915,310	11.6	88.4	84.6	4.5	2.4	8.5
5	HSBC BANK USA NATIONAL ASSN	DE	184,492	4,221,140	2.5	97.5	51.4	16.9	2.1	29.7
6	WELLS FARGO BANK NA	SD	467,861	1,030,570	9.8	90.2	93.4	4.4	2.0	0.3
7	BANK OF NEW YORK	NY	115,672	935,243	8.7	91.3	81.8	16.9	1.0	0.2
8	STATE STREET BANK&TRUST CO	MA	134,002	782,760	0.4	99.6	3.3	96.7	0.0	0.0
9	SUNTRUST BANK	GA	175,108	302,095	43.8	56.2	93.9	2.3	3.4	0.4
10	PNC BANK NATIONAL ASSN	PA	124,782	285,554	30.7	69.3	90.7	6.6	0.7	2.1
11	MELLON BANK NATIONAL ASSN	PA	39,674	194,970	4.1	95.9	18.0	80.9	1.1	0.0
12	NORTHERN TRUST CO	IL	58,398	139,296	0.0	100.0	4.6	95.2	0.0	0.2
13	KEYBANK NATIONAL ASSN	OH	95,862	122,429	15.9	84.1	81.1	12.0	0.3	6.6
14	NATIONAL CITY BANK	OH	138,755	112,789	7.5	92.5	94.9	3.1	0.0	2.0
15	U S BANK NATIONAL ASSN	OH	232,760	93,954	18.8	81.2	88.3	10.5	0.1	1.1
16	MERRILL LYNCH BANK USA	UT	78,052	55,574	34.0	66.0	79.5	1.9	2.9	15.7
17	RBS CITIZENS NATIONAL ASSN	RI	126,863	53,837	0.0	100.0	92.1	7.4	0.0	0.4
18	REGIONS BANK	AL	137,050	53,155	15.3	84.7	98.8	0.8	0.0	0.4
19	LASALLE BANK NATIONAL ASSN	IL	74,424	50,964	0.0	100.0	85.0	3.3	7.3	4.4
20	BRANCH BANKING&TRUST CO	NC	127,698	50,903	17.1	82.9	99.3	0.4	0.0	0.4
21	FIFTH THIRD BANK	OH	61,463	50,421	0.1	99.9	72.0	26.6	0.9	0.5
22	FIRST TENNESSEE BANK NA	TN	36,726	36,193	19.6	80.4	100.0	0.0	0.0	0.0
23	UNION BANK OF CALIFORNIA NA	CA	55,157	29,811	0.0	100.0	74.6	15.7	9.8	0.0
24	DEUTSCHE BANK TR CO AMERICAS	NY	35,425	28,768	0.0	100.0	47.1	6.6	28.5	17.7
25	LEHMAN BROTHERS COML BK	UT	5,834	28,236	0.0	100.0	99.9	0.1	0.0	0.0
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES			\$7,044,723	\$163,787,992	\$7,614,649	\$156,173,343	\$129,236,096	\$16,583,683	\$3,580,586	\$14,387,627
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES			2,618,789	408,195	12,932	395,263	338,167	30,789	14,776	24,463
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES			9,663,512	164,196,187	7,627,581	156,568,605	129,574,263	16,614,472	3,595,362	14,412,090
TOP 25 COMMERCIAL BANKS & TC: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				(%)	(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				99.8	4.6	78.7	10.1	10.1	2.2	8.8
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				100.0	0.0	0.2	0.0	0.0	0.0	0.0
					4.6	78.9	10.1	10.1	2.2	8.8

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Before the first quarter of 1995 total derivatives included spot foreign exchange. Beginning in the first quarter, 1995, spot foreign exchange was reported separately.

Note: Numbers may not add due to rounding.

Data source: Call Reports, schedule RC-1

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
First Quarter 2008

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq108.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities First Quarter 2008

Executive Summary

- U.S. commercial banks generated first quarter 2008 trading revenues in cash and derivative instruments of \$1.13 billion, compared to \$9.97 billion of trading losses in the fourth quarter of 2007.
- Net current credit exposure increased 50% to \$465 billion from the fourth quarter, and is 159% higher than a year ago. The rapid increase in credit exposure results from sharply lower interest rates and higher credit spreads, which created a large increase in derivatives receivables.
- The notional value of derivatives held by U.S. commercial banks increased \$14.7 trillion, or 9 percent, to \$180.3 trillion in the first quarter.
- Derivative contracts remain concentrated in interest rate products, which comprise 79% of total derivative notional value. The notional value of credit derivative contracts, 99% of which are credit default swaps, increased 4% during the quarter to \$16.4 trillion.

The OCC's quarterly report on bank derivatives activities and trading revenues is based on Call Report information provided by all insured U.S. commercial banks and trust companies, as well as on other published financial data.

Derivatives activity in the U.S. banking system is dominated by a small group of large financial institutions. Five large commercial banks represent 97% of the total industry notional amount, 93% of total trading revenues, and 85% of industry net current credit exposure.

While bank supervisors normally have concerns about market or product concentrations, there are three important mitigating factors with respect to derivatives activities. First, there are a number of other providers of derivatives products, such as investment banks and foreign banks, whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is appropriately concentrated in those institutions that have made the resource commitment to be able to operate this business in a safe and sound manner. Third, the OCC has examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation and compliance risks of derivatives activities.

Revenues

Credit market turmoil continues to weigh heavily on bank trading revenues. Banks reported trading revenues of \$1.13 billion in the first quarter, rebounding from a \$9.97 billion trading loss – the first ever for the banking system – in the fourth quarter. Despite the improvement, revenues in the first quarter are sharply lower than in recent first quarters (a record \$7.0 billion in 2007 and \$5.7 billion in 2006), as banks continued to incur writedowns on CDO exposures related to subprime mortgages and faced a challenging trading environment in credit markets.

Trading performance in interest rate and foreign exchange contracts was strong, each exceeding the same quarter of last year and their 8 quarter averages. Interest rate revenues were \$2.8 billion, the third-highest quarter ever, compared to a loss of \$357 million in the fourth quarter and an 8 quarter average of \$1.8 billion.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
MARCH 31, 2008, \$ MILLIONS
NOTE: DATA ARE PRELIMINARY**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT	SPOT FX
1	JPMORGAN CHASE & CO.	NY	\$1,642,862	\$89,831,343	\$1,915,199	\$2,820,284	\$7,398,869	\$57,119,637	\$12,352,809	\$8,224,545		\$411,173
2	CITIGROUP INC.	NY	2,199,848	41,310,119	696,237	3,570,002	4,977,299	20,853,726	7,354,914	3,907,941		375,989
3	BANK OF AMERICA CORPORATION	NC	1,743,478	38,956,532	1,080,438	795,404	4,545,133	25,820,440	3,628,820	3,086,298		172,826
4	WACHOVIA CORPORATION	NC	808,575	4,871,992	261,788	188,988	171,226	3,198,911	580,824	470,255		23,280
5	HSBC NORTH AMERICA HOLDINGS INC.	IL	493,011	4,247,881	86,844	12,717	486,336	2,017,426	304,542	1,340,016		73,528
6	TALUS CORPORATION	NY	750,323	1,436,203	134,948	234,787	744,414	282,673	16,685	22,696		110
7	WELLS FARGO & COMPANY	CA	595,221	1,425,976	198,418	23,513	625,483	429,840	145,740	2,982		19,284
8	BANK OF NEW YORK MELLON CORPORATION, THE	NY	205,151	1,208,593	69,168	21,874	382,673	367,885	364,941	2,052		48,580
9	STATE STREET CORPORATION	MA	154,479	904,043	1,339	1,786	817,261	17,338	66,082	238		34,388
10	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	140,026	244,832	28,200	33,021	6,631	131,232	40,140	5,607		1,037
11	SUNTRUST BANKS, INC.	GA	178,987	241,768	45,716	8,720	24,241	123,894	37,040	2,158		1,493
12	METLIFE, INC.	NY	557,132	177,547	9,149	0	17,774	64,627	82,827	3,169		0
13	NORTHERN TRUST CORPORATION	IL	77,480	164,582	1	0	153,413	10,336	570	264		17,860
14	NATIONAL CITY CORPORATION	OH	155,047	155,971	28,983	1,200	33,708	34,334	55,496	2,250		493
15	KEYCORP	OH	101,596	139,754	24,358	2,010	12,491	84,698	7,602	8,594		972
16	BARCLAYS GROUP US INC.	DE	485,626	118,310	5,227	0	60,427	23,397	25,345	3,914		0
17	U.S. BANCORP	MN	241,781	103,369	3,311	12,000	23,685	52,881	9,836	1,656		690
18	REGIONS FINANCIAL CORPORATION	AL	144,251	71,231	8,740	4,000	1,420	53,621	3,227	222		7
19	CITIZENS FINANCIAL GROUP, INC.	RI	161,759	67,130	0	0	4,408	61,172	1,291	259		244
20	FIFTH THIRD BANCORP	OH	111,396	60,124	33	0	9,129	38,998	11,188	776		922
21	BB&T CORPORATION	NC	136,417	58,113	7,096	0	9,646	32,928	8,097	348		23
22	CAPITAL ONE FINANCIAL CORPORATION	VA	150,609	40,326	0	0	1,021	39,306	0	0		1
23	FIRST HORIZON NATIONAL CORPORATION	TN	37,269	38,301	240	0	18,630	13,356	6,076	0		1
24	UNIONBANCAL CORPORATION	CA	57,933	31,663	0	0	4,082	17,146	10,435	0		980
25	TD BANK/NORTH INC.	ME	118,171	27,943	0	0	12,111	11,216	4,541	74		18
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			\$11,448,430	\$185,933,647	\$4,605,431	\$7,730,306	\$20,491,511	\$110,901,017	\$25,119,068	\$17,086,314		\$1,183,898

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
MARCH 31, 2008, \$ MILLIONS
NOTE: DATA ARE PRELIMINARY

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	EXCH TRADED CONTRACTS	PERCENT (%)	OTC CONTRACTS	PERCENT (%)	PERCENT INT RATE CONTRACTS	FOREIGN EXCH CONTRACTS	PERCENT (%)	PERCENT OTHER CONTRACTS	PERCENT CREDIT DERIVATIVES
1	JPMORGAN CHASE BANK NA	OH	\$1,407,568	\$89,997,271	5.1	94.9	79.6	8.7	79.6	8.7	2.7	2.7	9.0
2	BANK OF AMERICA NA	NC	1,355,154	37,939,665	4.4	95.6	83.2	7.4	83.2	7.4	1.2	1.2	8.2
3	CITIBANK NATIONAL ASSN	NV	1,292,503	37,691,434	1.8	98.2	75.9	14.3	75.9	14.3	0.8	0.8	8.9
4	WACHOVIA BANK NATIONAL ASSN	NC	666,241	4,884,775	9.2	90.8	83.4	4.8	83.4	4.8	2.5	2.5	9.3
5	HSBC BANK USA NATIONAL ASSN	DE	188,463	4,279,737	2.2	97.8	49.9	16.5	49.9	16.5	2.2	2.2	31.3
6	WELLS FARGO BANK NA	SD	486,886	1,440,229	15.1	84.9	82.4	3.4	82.4	3.4	2.3	2.3	0.1
7	BANK OF NEW YORK	NY	128,342	1,058,618	7.5	92.5	82.4	16.4	82.4	16.4	1.0	1.0	0.2
8	STATE STREET BANK&TRUST CO	MA	147,472	904,593	0.3	99.7	3.1	96.9	3.1	96.9	0.0	0.0	0.0
9	PNC BANK NATIONAL ASSN	PA	128,623	248,705	24.5	75.5	85.4	11.7	85.4	11.7	0.5	0.5	2.3
10	SUNTRUST BANK	GA	174,716	241,369	22.6	77.4	90.8	3.6	90.8	3.6	4.7	4.7	0.9
11	MELLON BANK NATIONAL ASSN	PA	41,727	192,105	6.0	94.0	20.9	77.7	20.9	77.7	1.4	1.4	0.0
12	NORTHERN TRUST CO	IL	67,962	164,605	0.0	100.0	4.6	95.2	4.6	95.2	0.0	0.0	0.2
13	NATIONAL CITY BANK	OH	152,519	158,612	19.0	81.0	96.3	2.2	96.3	2.2	0.0	0.0	1.4
14	KEYBANK NATIONAL ASSN	OH	97,979	134,344	18.6	81.4	81.4	11.7	81.4	11.7	0.4	0.4	6.4
15	U S BANK NATIONAL ASSN	OH	237,269	99,610	15.4	84.6	87.1	11.1	87.1	11.1	0.1	0.1	1.7
16	REGIONS BANK	AL	139,766	69,741	18.3	81.7	99.1	0.6	99.1	0.6	0.0	0.0	0.3
17	BRANCH BANKING&TRUST CO	NC	131,916	61,752	11.5	88.5	99.1	0.3	99.1	0.3	0.0	0.0	0.6
18	FIFTH THIRD BANK	OH	64,564	55,993	0.1	99.9	68.3	30.4	68.3	30.4	0.8	0.8	0.5
19	RBS CITIZENS NATIONAL ASSN	RI	130,820	54,602	0.0	100.0	92.0	7.5	92.0	7.5	0.0	0.0	0.5
20	MERRILL LYNCH BANK USA	UT	63,003	46,761	24.9	75.1	73.7	3.3	73.7	3.3	3.3	3.3	19.8
21	FIRST TENNESSEE BANK NA	TN	37,064	37,901	0.6	99.4	100.0	0.0	100.0	0.0	0.0	0.0	0.0
22	LASALLE BANK NATIONAL ASSN	IL	71,098	36,884	0.0	100.0	92.5	0.6	92.5	0.6	0.7	0.7	6.2
23	UNION BANK OF CALIFORNIA NA	CA	57,413	32,063	0.0	100.0	72.9	13.9	72.9	13.9	0.0	0.0	0.0
24	UBS BANK USA	UT	27,989	31,177	0.0	100.0	100.0	0.0	100.0	0.0	0.0	0.0	0.0
25	DEUTSCHE BANK TR CO AMERICAS	NY	36,216	30,693	0.0	100.0	50.9	7.4	50.9	7.4	26.8	26.8	14.9
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES					\$7,970,059	\$171,923,180	\$141,494,953	\$18,466,451	\$141,494,953	\$18,466,451	\$3,523,248	\$3,523,248	\$16,408,588
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES					10,934	440,042	369,802	30,984	369,802	30,984	17,364	17,364	32,826
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES					7,980,994	172,363,222	141,864,755	18,497,435	141,864,755	18,497,435	3,540,612	3,540,612	16,441,414
TOP 25 COMMERCIAL BANKS & TC: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					(%)	(%)	(%)	(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					99.7	95.3	78.5	10.2	78.5	10.2	2.0	2.0	9.1
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					100.0	100.0	0.2	0.0	0.2	0.0	0.0	0.0	0.0
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					100.0	100.0	78.7	10.3	78.7	10.3	2.0	2.0	9.1

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Numbers may not add due to rounding.

Data source: Call Reports, schedule RC-L

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
Second Quarter 2008

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq208.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities Second Quarter 2008

Executive Summary

- U.S. commercial banks reported \$1.6 billion of trading revenues in cash and derivative instruments in the second quarter of 2008, compared to \$721 million in the first quarter of 2008 and a \$2.0 billion average over the past eight quarters.
- Net current credit exposure decreased 13% from the first quarter to \$406 billion, but remained more than twice the \$199 billion exposure of a year ago.
- The notional value of derivatives held by U.S. commercial banks increased \$1.8 trillion in the second quarter, or 1 percent, to \$182.1 trillion.
- Derivative contracts remain concentrated in interest rate products, which comprise 80% of total derivative notional values. The notional value of credit derivative contracts decreased by 6% during the quarter to \$15.5 trillion, in part due to industry efforts to eliminate offsetting trades. Credit default swaps comprise 99% of credit derivatives.

The OCC's quarterly report on bank derivatives activities and trading revenues is based on Call Report information provided by all insured U.S. commercial banks and trust companies, as well as on other published financial data.

Derivatives activity in the U.S. banking system is dominated by a small group of large financial institutions. Five large commercial banks represent 97% of the total industry notional amount and 89% of industry net current credit exposure.

While market or product concentrations are a concern for bank supervisors, there are three important mitigating factors with respect to derivatives activities. First, there are a number of other providers of derivatives products, such as investment banks and foreign banks, whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is appropriately concentrated in those institutions that have made the resource commitment to be able to operate this business in a safe and sound manner. Third, the OCC has examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation and compliance risks of derivatives activities.

Revenues

Trading conditions remained challenging in the second quarter, especially for credit instruments. Banks reported total trading revenues of \$1.6 billion in the second quarter, an increase of \$893 million, or 124%, from \$721 million in the first quarter (revised)¹. Despite the improvement, revenues in the second quarter of 2008 were 74% lower than in the second quarter of 2007. Losses from credit trading narrowed in the second quarter to \$2.7 billion, from \$3.5 billion in the first quarter, as banks continued to write-down, albeit at a slower pace, CDO, CMBS, auction rate securities and leveraged loan exposures in their trading portfolios.

¹ The OCC uses preliminary Call Report data for this report. First quarter revenues were previously reported as \$1.13 billion. Based upon final information, after re-filed Call Reports, revenues fell to \$721 million.

TABLE 2

NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
JUNE 30, 2008, \$ MILLIONS
NOTE: DATA ARE PRELIMINARY

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT	SPOT FX
1	JPMORGAN CHASE & CO.	NY	\$1,775,670	\$98,827,133	\$1,634,770	\$2,737,369	\$8,233,328	\$62,194,800	\$13,734,794	\$10,232,072		\$342,892
2	BANK OF AMERICA CORPORATION	NC	1,723,270	40,624,420	2,015,164	915,438	4,597,558	26,680,490	3,722,447	2,693,324		183,635
3	CITIGROUP INC.	NY	2,100,385	39,934,798	718,255	3,406,685	4,878,797	20,030,126	7,300,297	3,600,638		359,242
4	WACHOVIA CORPORATION	NC	812,433	4,432,920	227,054	142,212	163,057	2,948,093	548,606	403,898		25,852
5	HSBC NORTH AMERICA HOLDINGS INC.	IL	461,156	4,081,255	88,602	121,588	463,476	1,877,591	290,714	1,239,284		57,931
6	WELLS FARGO & COMPANY	CA	609,074	1,501,876	283,238	17,943	470,754	548,289	178,248	3,404		18,278
7	TAUNUS CORPORATION	NY	659,772	1,269,409	204,415	270,607	576,283	166,698	25,728	25,678		381
8	BANK OF NEW YORK MELLON CORPORATION, THE	NY	201,344	1,151,186	36,416	13,469	358,930	374,687	366,007	1,677		48,422
9	STATE STREET CORPORATION	MA	146,517	836,659	1,215	498	758,977	19,265	56,467	238		43,724
10	SUNTRUST BANKS, INC.	GA	177,233	270,875	53,951	30,246	15,649	130,080	37,846	3,104		520
11	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	142,791	206,708	25,323	13,381	7,012	128,006	27,808	5,179		1,790
12	NORTHERN TRUST CORPORATION	IL	74,807	184,153	0	0	172,357	10,984	559	254		36,250
13	METLIFE, INC.	NY	555,787	168,247	12,992	0	8,072	61,482	81,442	4,260		0
14	KEYCORP	OH	101,958	141,367	22,272	0	13,580	87,875	8,926	8,714		1,468
15	NATIONAL CITY CORPORATION	OH	153,679	108,130	9,058	250	12,944	40,240	43,230	2,408		250
16	U.S. BANCORP	MN	246,538	93,783	945	5,000	21,010	56,278	8,380	2,170		1,017
17	BARCLAYS GROUP US INC.	DE	325,618	83,628	9,720	0	38,421	24,424	6,348	4,716		0
18	REGIONS FINANCIAL CORPORATION	AL	144,438	77,585	13,591	4,000	1,238	55,574	2,899	283		4
19	CITIZENS FINANCIAL GROUP, INC.	RI	161,970	71,184	0	0	4,645	65,059	1,240	240		61
20	FIFTH THIRD BANCORP	OH	114,975	61,269	37	0	6,526	41,473	12,080	1,153		1,296
21	BB&T CORPORATION	NC	136,465	59,894	4,299	6	7,852	40,114	7,560	52		44
22	CAPITAL ONE FINANCIAL CORPORATION	VA	151,114	43,536	0	0	1,085	42,451	0	0		0
23	UNIONBANCAL CORPORATION	CA	60,594	35,086	786	0	3,927	18,777	11,596	0		1,204
24	TD BANKNORTH INC.	ME	116,845	31,346	2	0	10,739	14,516	5,969	120		33
25	FIRST HORIZON NATIONAL CORPORATION	TN	35,551	27,827	267	0	10,132	12,927	4,501	0		1
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			\$11,189,984	\$194,324,266	\$5,362,370	\$7,678,692	\$20,896,348	\$115,670,296	\$26,483,693	\$18,232,866		\$1,124,298

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L.

TABLE 3

DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
JUNE 30, 2008. \$ MILLIONS
NOTE: DATA ARE PRELIMINARY

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,378,468	\$91,287,215	4.3	95.7	80.2	8.7	2.6	8.6
2	BANK OF AMERICA NA	NC	1,327,429	39,671,792	6.6	93.4	84.9	7.1	1.2	6.8
3	CITIBANK NATIONAL ASSN	NV	1,228,445	37,132,353	1.7	98.3	76.7	13.8	0.9	8.6
4	WACHOVIA BANK NATIONAL ASSN	NC	670,639	4,447,446	8.3	91.7	84.0	4.0	3.3	8.7
5	HSBC BANK USA NATIONAL ASSN	DE	177,466	4,063,104	3.5	96.5	49.8	17.5	2.2	30.5
6	WELLS FARGO BANK NA	SD	503,327	1,515,920	19.3	80.7	93.7	3.5	2.7	0.1
7	BANK OF NEW YORK	NY	130,062	1,049,529	4.8	95.2	77.9	20.6	1.3	0.2
8	STATE STREET BANK&TRUST CO	MA	138,859	837,209	0.2	99.8	3.4	96.6	0.0	0.0
9	SUNTRUST BANK	GA	171,501	268,822	31.3	68.7	90.8	3.4	4.6	1.2
10	PNC BANK NATIONAL ASSN	PA	128,348	210,693	18.2	81.8	90.1	6.7	0.6	2.5
11	NORTHERN TRUST CO	IL	65,200	184,177	0.0	100.0	4.3	95.5	0.0	0.1
12	MELLON BANK NATIONAL ASSN	PA	39,476	183,003	0.0	100.0	16.5	82.2	1.3	0.0
13	KEYBANK NATIONAL ASSN	OH	98,048	136,697	16.3	83.7	80.2	12.7	0.7	6.4
14	NATIONAL CITY BANK	OH	151,165	110,748	8.4	91.6	95.1	2.7	0.0	2.2
15	U S BANK NATIONAL ASSN	OH	242,308	87,448	6.8	93.2	83.5	13.9	0.1	2.5
16	REGIONS BANK	AL	139,354	80,155	21.9	78.1	99.1	0.5	0.0	0.4
17	BRANCH BANKING&TRUST CO	NC	132,884	63,524	6.8	93.2	99.5	0.4	0.0	0.1
18	MERRILL LYNCH BANK USA	UT	58,042	59,567	57.8	42.2	81.0	1.1	2.6	15.4
19	RBS CITIZENS NATIONAL ASSN	RI	132,051	57,625	0.0	100.0	91.9	7.6	0.0	0.4
20	FIFTH THIRD BANK	OH	67,272	55,976	0.1	99.9	74.7	23.8	1.0	0.6
21	UNION BANK OF CALIFORNIA NA	CA	60,228	35,486	2.2	97.8	71.3	12.9	15.9	0.0
22	LASALLE BANK NATIONAL ASSN	IL	68,379	34,601	0.0	100.0	94.3	0.0	0.4	5.3
23	UBS BANK USA	UT	27,316	34,160	0.0	100.0	100.0	0.0	0.0	0.0
24	DEUTSCHE BANK TR CO AMERICAS	NY	46,071	33,887	0.0	100.0	50.5	7.1	27.0	15.3
25	LEHMAN BROTHERS COML BK	UT	6,418	28,086	0.0	100.0	100.0	0.0	0.0	0.0
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES			\$7,188,756	\$181,669,224	\$8,228,766	\$173,440,458	\$144,535,366	\$18,231,156	\$3,463,180	\$15,439,522
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES			2,741,623	466,209	11,007	455,202	388,106	30,444	18,378	29,281
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES			9,930,380	182,135,432	8,239,773	173,895,660	144,923,472	18,261,599	3,481,558	15,468,802
TOP 25 COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				(%)	(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				99.7	4.5	79.4	10.0	1.9	1.9	8.5
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				100.0	0.0	0.2	0.0	0.0	0.0	0.0
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					4.5	79.6	10.0	1.9	1.9	8.5

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Numbers may not add due to rounding.

Data source: Call Reports, schedule RC-L.

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
Third Quarter 2008

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq308.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities Third Quarter 2008

Executive Summary

- U.S. commercial banks reported \$6.0 billion of trading revenues in cash and derivative instruments in the third quarter of 2008, compared to \$1.6 billion in the second quarter of 2008 and a \$2.2 billion average over the past eight quarters.
- Net current credit exposure increased 7% from the second quarter to \$435 billion, a level 73% more than the \$252 billion exposure of a year ago.
- The notional value of derivatives held by U.S. commercial banks decreased \$6.3 trillion in the third quarter, or 3%, to \$175.8 trillion.
- Derivative contracts remain concentrated in interest rate products, which comprise 78% of total derivative notional values. The notional value of credit derivative contracts increased by 4% during the quarter to \$16.1 trillion. Credit default swaps comprise 99% of credit derivatives.

The OCC's quarterly report on bank derivatives activities and trading revenues is based on Call Report information provided by all insured U.S. commercial banks and trust companies, as well as on other published financial data.

Derivatives activity in the U.S. banking system is dominated by a small group of large financial institutions. Five large commercial banks represent 97% of the total industry notional amount and 87% of industry net current credit exposure.

While market or product concentrations are a concern for bank supervisors, there are three important mitigating factors with respect to derivatives activities. First, there are a number of other providers of derivatives products whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is concentrated in those institutions that have the resources needed to be able to operate this business in a safe and sound manner. Third, the OCC has examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation and compliance risks of derivatives activities.

Revenues

Despite continued challenging trading conditions which have existed since the current market disruption began in mid-2007, banks reported a 272% increase in trading revenues to \$6.0 billion in the third quarter. National banks reported generally stable client flows and increased client revenues due to wider bid/offer spreads, but the significant turnaround in trading revenues is largely due to an accounting rule related to declines in the banks' own credit standing, as measured by their credit spreads. Accounting rules require firms to recognize gains when the value of their own liabilities declines and this adjustment for derivatives contracts is accounted for through trading revenues. So, while customer demand across most derivatives categories remains strong, trading conditions in credit markets, in particular, remain difficult and some banks continue to carry legacy positions in assets such as ABS CDOs for which there is virtually no market liquidity. Write-downs on those positions, however, moderated in the third quarter.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
SEPTEMBER 30, 2008, \$ MILLIONS**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT DERIVATIVES (OTC)	SPOT FX
1	JPMORGAN CHASE & CO.	NY	\$2,251,469	\$91,339,207	\$1,600,126	\$2,388,046	\$8,787,646	\$57,086,729	\$12,216,865	\$9,249,795	\$222,314	
2	BANK OF AMERICA CORPORATION	NC	1,836,452	39,979,154	1,755,204	902,674	4,662,786	26,713,165	3,477,939	2,467,388	237,073	
3	CITIGROUP INC.	NY	2,050,131	38,186,196	767,892	3,505,218	5,280,222	18,559,334	6,782,106	3,291,424	529,858	
4	HSBC NORTH AMERICA HOLDINGS INC.	IL	467,740	4,223,883	92,252	244,824	586,948	1,864,181	283,774	1,151,905	78,998	
5	WACHOVIA CORPORATION	NC	760,558	4,197,321	224,351	89,437	215,301	2,890,332	467,964	309,936	15,248	
6	TAUNUS CORPORATION	NY	613,058	1,475,063	159,770	287,015	823,956	168,441	9,483	26,398	548	
7	WELLS FARGO & COMPANY	CA	622,361	1,412,550	178,617	23,645	468,990	546,842	191,599	2,857	19,149	
8	BANK OF NEW YORK MELLON CORPORATION, THE	NY	267,636	1,183,808	28,549	58,355	384,111	374,735	336,641	1,417	56,680	
9	STATE STREET CORPORATION	MA	286,712	863,994	2,054	713	785,206	17,627	57,249	145	54,802	
10	SUNTRUST BANKS, INC.	GA	174,777	278,750	63,232	26,671	14,275	137,161	34,348	3,063	407	
11	BARCLAYS GROUP US INC.	DE	681,045	258,006	27,918	17	169,075	28,363	30,876	1,757	1,580	
12	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	145,645	195,043	26,499	12,635	6,517	121,142	23,456	4,795		
13	METLIFE, INC.	NY	521,298	178,340	10,466	0	24,896	57,897	80,703	4,378	0	
14	NORTHERN TRUST CORPORATION	IL	79,244	175,109	1	0	165,238	9,211	389	269	22,761	
15	KEYCORP	OH	101,495	140,940	20,652	4,400	15,325	82,914	9,958	7,690	1,277	
16	NATIONAL CITY CORPORATION	OH	143,696	121,115	16,007	350	12,326	47,438	42,700	2,293	123	
17	U.S. BANCORP	MN	247,055	103,458	1,640	9,000	23,872	57,605	9,618	1,723	878	
18	REGIONS FINANCIAL CORPORATION	AL	144,295	82,341	13,964	3,500	1,222	60,527	2,690	439	7	
19	CITIZENS FINANCIAL GROUP, INC.	RI	163,772	73,485	0	0	4,890	66,659	1,704	232	37	
20	B&T CORPORATION	NC	137,041	67,399	3,599	4	8,632	45,578	9,534	52	57	
21	FIFTH THIRD BANCORP	OH	116,294	63,468	94	0	8,999	43,222	9,977	1,176	863	
22	CAPITAL ONE FINANCIAL CORPORATION	VA	154,803	39,905	0	0	1,648	38,256	0	0	52	
23	TD BANKNORTH INC.	ME	117,631	33,210	0	0	9,343	18,768	4,985	113	51	
24	UNIONBANCAL CORPORATION	CA	62,600	33,157	2,361	0	4,371	17,903	8,522	0	1,059	
25	FIRST HORIZON NATIONAL CORPORATION	TN	32,805	24,946	287	0	10,870	11,600	2,189	0	2	
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			\$12,179,614	\$184,729,848	\$4,995,535	\$7,556,503	\$22,477,666	\$109,075,631	\$24,095,271	\$16,529,243	\$1,243,824	

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
SEPTEMBER 30, 2008, \$ MILLIONS

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,768,657	\$87,688,008	4.3	95.7	77.0	9.4	3.2	10.5
2	BANK OF AMERICA NA	NC	1,359,071	38,673,967	5.9	94.1	85.2	7.0	1.3	6.4
3	CITIBANK NATIONAL ASSN	NV	1,207,007	35,645,429	1.9	98.1	76.4	14.2	1.1	8.2
4	WACHOVIA BANK NATIONAL ASSN	NC	664,223	4,221,834	7.4	92.6	84.1	4.8	3.5	7.6
5	HSBC BANK USA NATIONAL ASSN	DE	181,587	4,133,712	4.8	95.2	51.1	19.1	2.0	27.9
6	WELLS FARGO BANK NA	SD	514,853	1,429,088	13.7	86.3	92.1	4.4	3.4	0.1
7	BANK OF NEW YORK MELLON	NY	218,699	1,193,652	7.3	92.7	73.5	25.0	1.4	0.1
8	STATE STREET BANK&TRUST CO	MA	276,291	869,294	3.1	99.7	91.0	3.2	4.8	0.6
9	SUNTRUST BANK	GA	170,007	276,689	32.5	67.5	92.7	4.2	2.5	1.1
10	PNC BANK NATIONAL ASSN	PA	134,780	198,478	19.6	80.4	92.7	4.2	0.6	2.5
11	NORTHERN TRUST CO	IL	68,930	175,128	0.0	100.0	4.5	95.3	0.0	0.2
12	KEYBANK NATIONAL ASSN	OH	97,811	136,302	18.4	81.6	79.7	14.1	0.6	5.6
13	NATIONAL CITY BANK	OH	141,501	123,530	13.2	86.8	95.7	2.5	0.0	1.9
14	U S BANK NATIONAL ASSN	OH	242,597	97,056	11.0	89.0	87.5	10.7	0.1	1.7
15	MERRILL LYNCH BANK USA	UT	61,643	94,255	77.0	23.0	88.2	0.7	1.6	9.6
16	REGIONS BANK	AL	139,556	80,094	21.8	78.2	98.9	0.6	0.0	0.5
17	BRANCH BANKING&TRUST CO	NC	133,166	71,044	5.1	94.9	99.5	0.4	0.0	0.1
18	RBS CITIZENS NATIONAL ASSN	RI	132,609	59,474	0.0	100.0	91.7	7.9	0.0	0.4
19	FIFTH THIRD BANK	OH	67,318	58,101	0.2	99.8	72.7	24.7	2.1	0.5
20	LASALLE BANK NATIONAL ASSN	IL	63,388	33,701	0.0	100.0	93.9	0.1	0.4	5.6
21	UNION BANK OF CALIFORNIA NA	CA	62,431	33,557	7.0	93.0	70.8	14.9	14.4	0.0
22	UBS BANK USA	UT	26,176	33,317	0.0	100.0	100.0	0.0	0.0	0.0
23	DEUTSCHE BANK TR CO AMERICAS	NY	43,932	27,004	0.0	100.0	67.5	10.2	3.6	18.8
24	MORGAN STANLEY BANK NA	UT	37,638	25,941	0.0	100.0	7.9	0.0	0.4	91.7
25	FIRST TENNESSEE BANK NA	TN	32,587	24,546	1.2	98.8	100.0	0.0	0.0	0.0
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES					\$7,816,395	\$167,586,807	\$136,807,439	\$18,452,314	\$4,002,249	\$16,141,200
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES					9,685	428,878	382,522	31,492	17,360	7,188
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES					7,826,080	168,015,685	137,189,961	18,483,806	4,019,609	16,148,388
TOP 25 COMMERCIAL BANKS & TC: % OF TOTAL COMMERCIAL BKS & TCs WITH DERIVATIVES					(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BKS & TCs WITH DERIVATIVES					99.8	95.3	77.8	10.5	2.3	9.2
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					100.0	95.5	78.0	10.5	2.3	9.2

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Numbers may not add due to rounding.

Data source: Call Reports, schedule RC-L

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
Fourth Quarter 2008

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq408.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities Fourth Quarter 2008

Executive Summary

- The notional value of derivatives held by U.S. commercial banks increased \$24.5 trillion in the fourth quarter, or 14%, to \$200.4 trillion, due to the migration of investment bank derivatives business into the commercial banking system.
- U.S. commercial banks lost \$9.2 billion trading in cash and derivative instruments in the fourth quarter of 2008 and for the year they reported trading losses of \$836 million. The poor results in 2008 reflect continued turmoil in financial markets, particularly for credit instruments.
- Net current credit exposure increased 84% from the third quarter to a record \$800 billion, and much of this is attributable to the sharp decline in interest rates in the fourth quarter.
- Derivative contracts remain concentrated in interest rate products, which comprise 82% of total derivative notional values. The notional value of credit derivative contracts decreased by 2% during the quarter to \$15.9 trillion. Credit default swaps are 98% of total credit derivatives.

The OCC's quarterly report on bank derivatives activities and trading revenues is based on Call Report information provided by all insured U.S. commercial banks and trust companies, as well as on other published financial data.

Derivatives activity in the U.S. banking system is dominated by a small group of large financial institutions. Five large commercial banks represent 96% of the total industry notional amount and 81% of industry net current credit exposure.

While market or product concentrations are normally a concern for bank supervisors, there are three important mitigating factors with respect to derivatives activities. First, there are a number of other providers of derivatives products whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is concentrated in those institutions that have the resources needed to be able to operate this business in a safe and sound manner. Third, the OCC and other supervisors have examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation and compliance risks of derivatives activities.

Revenues

Although the core financial intermediation business that is the cornerstone of trading activities in U.S. commercial banks was reasonably strong in the fourth quarter, the quarter was particularly difficult for a number of reasons, and banks reported a sizable trading loss of \$9.2 billion. Market liquidity suffered in the fourth quarter of 2008 and general economic conditions worsened, resulting in escalated write-downs in legacy credit positions, including CDOs, leveraged loans and mortgage-related exposures. These write-downs flowed through trading revenues and dwarfed the underlying strength in trade profitability from wide bid-ask spreads. Trading results in the fourth quarter also suffered due to an unfavorable combination of rising overall corporate credit spreads and declining credit spreads for the bank dealers themselves. Rising counterparty credit spreads increase the risk of derivatives receivables. Banks account for this increased risk by lowering the fair value of

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
DECEMBER 31, 2008, \$ MILLIONS**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT	SPOT FX
1	JPMORGAN CHASE & CO.	NY	\$2,175,052	\$87,780,914	\$1,163,565	\$1,654,602	\$8,639,036	\$56,516,117	\$11,419,715	\$8,387,879	\$8,387,879	\$389,411
2	BANK OF AMERICA CORPORATION	NC	1,822,068	39,081,848	1,620,706	742,693	4,143,390	27,053,113	3,483,259	2,038,687	2,038,687	70,268
3	CITIGROUP INC.	NY	1,947,439	33,424,365	735,543	2,432,127	4,286,935	16,947,076	5,989,192	3,033,492	3,033,492	150,274
4	WELLS FARGO & COMPANY	CA	1,309,639	5,105,850	372,652	65,905	736,903	3,061,344	582,587	286,459	286,459	9,056
5	HSBC NORTH AMERICA HOLDINGS INC.	IL	434,716	3,660,305	46,650	71,601	635,473	1,734,686	213,359	958,536	958,536	36,762
6	TAUNUS CORPORATION	NY	396,659	1,290,523	122,221	201,266	600,048	189,779	4,403	172,806	172,806	231
7	BANK OF NEW YORK MELLON CORPORATION, THE	NY	237,652	1,115,675	31,080	27,636	322,030	408,182	325,419	1,328	1,328	23,105
8	STATE STREET CORPORATION	MA	176,632	725,880	779	1,444	668,650	16,737	38,125	145	145	20,162
9	BARCLAYS GROUP US INC.	DE	279,777	290,379	4,375	120,089	153,101	11,334	0	1,481	1,481	0
10	SUNTRUST BANKS, INC.	GA	189,138	258,003	34,660	16,482	20,191	149,988	34,684	1,997	1,997	455
11	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	291,093	254,720	27,457	494	19,207	162,182	42,279	3,101	3,101	527
12	METLIFE, INC.	NY	501,678	198,088	19,908	0	33,344	58,007	81,610	5,219	5,219	0
13	NORTHERN TRUST CORPORATION	IL	82,054	128,977	0	0	120,465	7,874	402	235	235	4,810
14	KEYCORP	OH	105,231	126,664	18,441	0	10,798	80,567	9,671	7,186	7,186	558
15	U.S. BANKCORP	MIN	267,032	112,028	1,389	7,350	35,057	58,911	7,028	2,293	2,293	339
16	REGIONS FINANCIAL CORPORATION	AL	146,254	99,593	17,391	3,500	1,919	73,335	2,964	484	484	1
17	FIFTH THIRD BANCORP	OH	119,764	77,622	68	0	11,588	52,656	12,031	1,279	1,279	538
18	BB&T CORPORATION	NC	152,015	74,290	7,154	0	12,250	43,439	11,394	52	52	47
19	CITIZENS FINANCIAL GROUP, INC.	RI	160,444	63,067	0	0	5,770	54,964	2,064	268	268	34
20	CAPITAL ONE FINANCIAL CORPORATION	VA	165,913	41,578	0	0	1,710	39,868	0	0	0	0
21	UNIONBANCAL CORPORATION	CA	70,121	36,687	3,682	0	6,620	18,579	7,806	0	0	1,096
22	TD BANKNORTH INC.	ME	122,745	35,254	0	0	8,186	19,467	7,512	88	88	16
23	HUNTINGTON BANCSHARES INCORPORATED	OH	54,356	25,162	0	0	794	20,684	3,683	0	0	0
24	BOK FINANCIAL CORPORATION	OK	22,840	23,387	509	126	14,664	6,774	1,313	0	0	0
25	HARRIS FINANCIAL CORP.	DE	88,258	21,037	2	1,478	2,420	15,126	1,175	836	836	34
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			\$11,318,572	\$174,051,895	\$4,228,234	\$5,346,794	\$20,490,551	\$106,800,791	\$22,281,675	\$14,903,850	\$14,903,850	\$707,724

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Although there are holding companies for Goldman Sachs and Morgan Stanley, they are not listed here since the filings were not publicly available.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

Note: Numbers may not add due to rounding.

TABLE 3

**DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
DECEMBER 31, 2008, \$ MILLIONS**

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,746,242	\$87,362,672	3.0	97.0	80.0	7.8	2.6	9.6
2	BANK OF AMERICA NA	NC	1,471,631	38,304,564	5.7	94.3	87.8	5.6	1.2	5.4
3	CITIBANK NATIONAL ASSN	NV	1,231,154	31,887,869	2.0	98.0	77.6	13.0	0.8	8.6
4	GOLDMAN SACHS BANK USA	UT	162,474	30,229,614	1.6	98.4	89.7	5.7	0.0	4.6
5	HSBC BANK USA NATIONAL ASSN	VA	181,620	3,713,075	3.2	96.8	55.6	16.8	1.7	25.8
6	WACHOVIA BANK NATIONAL ASSN	NC	635,476	3,664,823	7.1	92.9	83.8	4.6	3.3	8.2
7	WELLS FARGO BANK NA	SD	538,958	1,494,745	11.6	88.4	92.4	4.6	3.0	0.1
8	BANK OF NEW YORK MELLON	NY	195,164	1,125,889	5.2	94.8	79.0	19.6	0.1	0.1
9	STATE STREET BANK&TRUST CO	MA	171,228	731,180	0.3	99.7	3.4	95.9	0.0	0.7
10	SUNTRUST BANK	GA	185,099	255,942	20.0	80.0	91.5	3.0	4.7	0.8
11	PNC BANK NATIONAL ASSN	PA	140,777	141,291	4.2	95.8	92.7	4.4	0.7	2.2
12	NORTHERN TRUST CO	IL	70,434	128,376	0.0	100.0	5.4	94.4	0.0	0.2
13	KEYBANK NATIONAL ASSN	OH	101,869	122,560	15.0	85.0	81.8	11.9	0.5	5.9
14	NATIONAL CITY BANK	OH	146,058	117,785	18.5	81.5	96.1	2.0	0.0	1.9
15	U S BANK NATIONAL ASSN	OH	261,776	105,626	8.3	91.7	88.1	9.8	0.0	2.1
16	REGIONS BANK	AL	142,084	97,421	21.4	78.6	99.1	0.4	0.0	0.5
17	MERRILL LYNCH BANK USA	UT	61,810	88,520	82.2	17.8	87.0	1.4	1.6	10.1
18	BRANCH BANKING&TRUST CO	NC	147,484	77,250	9.3	90.7	99.1	0.8	0.0	0.1
19	FIFTH THIRD BANK	OH	69,460	70,418	0.1	99.9	79.8	18.2	1.5	0.5
20	RBS CITIZENS NATIONAL ASSN	RI	129,491	51,238	0.0	100.0	89.3	10.2	0.0	0.5
21	UBS BANK USA	CA	30,495	37,167	9.9	100.0	100.0	0.0	0.0	0.0
22	UNION BANK NATIONAL ASSN	CA	69,737	37,087	0.0	100.0	70.6	19.2	10.2	0.0
23	MORGAN STANLEY BANK NA	UT	58,058	36,561	0.0	100.0	33.6	0.0	0.3	66.1
24	DEUTSCHE BANK TR CO AMERICAS	NY	50,801	31,437	0.0	100.0	80.8	3.5	0.3	15.3
25	HUNTINGTON NATIONAL BANK	OH	53,548	25,162	0.0	100.0	99.9	0.1	0.0	0.0
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES					\$6,778,682	\$193,159,592	\$164,002,894	\$16,798,835	\$3,242,256	\$15,894,289
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES					5,492	437,841	401,512	25,024	14,378	2,419
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES					6,784,174	193,597,433	164,404,406	16,823,859	3,256,634	15,896,708
TOP 25 COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					99.8	96.4	81.8	8.4	1.6	7.9
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					100.0	100.0	82.0	8.4	1.6	7.9

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Numbers may not add due to rounding.

Data source: Call Reports, schedule RC-1

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
First Quarter 2009

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq109.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities First Quarter 2009

Executive Summary

- The notional value of derivatives held by U.S. commercial banks increased \$1.6 trillion in the first quarter, or 1%, to \$202.0 trillion, due to the continued migration of investment bank derivatives business into the commercial banking system.
- U.S. commercial banks generated record revenues of \$9.8 billion trading cash and derivative instruments in the first quarter of 2009, compared to a \$9.2 billion loss in the fourth quarter of 2008.
- Net current credit exposure decreased 13% to \$695 billion.
- Derivative contracts remain concentrated in interest rate products, which comprise 84% of total derivative notional values. The notional value of credit derivative contracts decreased by 8% during the quarter to \$14.6 trillion.

The OCC's quarterly report on bank derivatives activities and trading revenues is based on Call Report information provided by all insured U.S. commercial banks and trust companies, as well as on other published financial data.

Derivatives activity in the U.S. banking system is dominated by a small group of large financial institutions. Five large commercial banks represent 96% of the total industry notional amount and 83% of industry net current credit exposure.

While market or product concentrations are normally a concern for bank supervisors, there are three important mitigating factors with respect to derivatives activities. First, there are a number of other providers of derivatives products whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is concentrated in those institutions that have the resources needed to be able to operate this business in a safe and sound manner. Third, the OCC and other supervisors have examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation and compliance risks of derivatives activities.

Revenues

Bank trading results rebounded sharply in the first quarter, consistent with the historical trend for strong first quarter revenues. Banks reported a record \$9.8 billion in first quarter trading revenues, compared to a loss of \$9.2 billion in the fourth quarter of 2008. Bank trading results benefited from solid core financial intermediation business flows, with continued wide bid/offer spreads, as well as fewer write-downs on legacy credit assets. As noted in previous quarterly reports, another factor that drove revenues was the recognition of changes in the value of trading liabilities. When bank credit spreads increase, as they did in the first quarter, banks reflect the declining value of their liabilities as trading revenues. While trading performance was strong even without the liability value changes, this source did add materially to first quarter trading performance.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
MARCH 31, 2009, \$ MILLIONS**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	TOTAL	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT	SPOT
													FX
1	JPMORGAN CHASE & CO.	NY	\$2,079,188	\$81,108,352	\$81,108,352	\$1,208,196	\$2,128,130	\$8,422,181	\$51,221,093	\$10,633,371	\$7,495,381	\$7,495,381	\$580,657
2	BANK OF AMERICA CORPORATION	NC	2,323,415	77,874,726	77,874,726	4,282,682	1,200,247	9,132,396	50,702,167	6,907,884	5,649,351	5,649,351	124,610
3	GOLDMAN SACHS GROUP, INC., THE	NY	925,987	47,749,124	47,749,124	734,384	1,070,253	1,631,012	30,958,251	6,753,774	6,601,450	6,601,450	201,692
4	MORGAN STANLEY	NY	626,023	39,125,255	39,125,255	908,085	1,141,565	1,126,685	26,111,822	3,529,961	6,307,137	6,307,137	168
5	CITIGROUP INC.	NY	1,822,578	31,715,734	31,715,734	591,674	2,364,057	4,743,483	15,198,602	5,868,290	2,949,628	2,949,628	378,556
6	WELLS FARGO & COMPANY	CA	1,285,891	5,184,561	5,184,561	338,202	51,797	1,217,451	2,747,517	543,310	286,284	286,284	21,808
7	HSBC NORTH AMERICA HOLDINGS INC.	IL	401,825	3,418,393	3,418,393	46,258	113,862	594,897	1,564,517	185,378	913,481	913,481	39,248
8	TAUNUS CORPORATION	NY	368,367	1,273,249	1,273,249	122,124	157,242	666,884	162,189	20,486	144,324	144,324	430
9	BANK OF NEW YORK MELLON CORPORATION, THE	NY	203,883	1,144,421	1,144,421	24,928	39,423	370,542	403,950	304,457	1,121	1,121	35,372
10	STATE STREET CORPORATION	MA	144,858	644,839	644,839	2,378	2,000	570,731	24,079	45,480	170	170	27,506
11	BARCLAYS GROUP US INC.	DE	342,544	387,253	387,253	42,465	124,568	203,039	16,334	0	847	847	0
12	GMAC LLC	MI	179,551	325,012	325,012	113,423	50,072	27,831	119,125	14,541	20	20	0
13	SUNTRUST BANKS, INC.	GA	179,216	294,989	294,989	24,497	39,903	36,517	152,684	39,870	1,518	1,518	381
14	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	286,472	251,188	251,188	31,485	4,207	28,096	152,559	28,329	6,512	6,512	1,163
15	METLIFE, INC.	NY	491,407	179,420	179,420	17,721	0	33,227	57,891	64,393	6,188	6,188	0
16	KEYCORP	OH	98,371	128,454	128,454	15,688	640	8,014	86,243	10,727	7,142	7,142	561
17	NORTHERN TRUST CORPORATION	IL	78,465	124,405	124,405	0	0	116,003	8,014	202	186	186	13,483
18	U.S. BANCORP	MN	263,624	113,076	113,076	994	5,000	35,738	59,872	8,917	2,555	2,555	551
19	REGIONS FINANCIAL CORPORATION	AL	141,950	88,792	88,792	8,034	3,500	2,858	71,068	2,733	599	599	7
20	FIFTH THIRD BANCORP	OH	119,313	77,637	77,637	69	0	11,956	51,803	12,611	1,197	1,197	630
21	BB&T CORPORATION	NC	143,425	75,704	75,704	4,607	0	20,010	45,416	5,619	51	51	39
22	CITIZENS FINANCIAL GROUP, INC.	RI	167,541	63,536	63,536	0	0	5,755	55,285	2,234	262	262	55
23	CAPITAL ONE FINANCIAL CORPORATION	VA	177,387	51,533	51,533	80	0	3,098	48,355	0	0	0	0
24	TD BANKNORTH INC.	ME	128,655	40,208	40,208	0	0	7,545	24,739	7,646	278	278	8
25	CIT GROUP INC.	NY	75,653	40,133	40,133	0	0	3,852	27,914	5,892	2,476	2,476	1
TOP 25 HOLDING COMPANIES WITH DERIVATIVES					\$13,055,590	\$291,479,995	\$8,517,975	\$8,496,466	\$29,019,801	\$180,071,489	\$34,996,105	\$30,378,159	\$1,426,926

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
MARCH 31, 2009, \$ MILLIONS

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,688,164	\$81,161,463	3.9	96.1	80.2	7.8	2.7	9.2
2	GOLDMAN SACHS BANK USA	NY	161,455	39,927,511	1.4	98.6	93.9	2.9	0.0	3.2
3	BANK OF AMERICA NA	NC	1,434,037	38,864,033	4.8	95.2	89.3	4.9	1.0	4.8
4	CTIBANK NATIONAL ASSN	NV	1,143,561	29,618,659	2.8	97.2	77.6	12.4	0.9	9.1
5	HSBC BANK USA NATIONAL ASSN	VA	3,454,013	177,778	4.2	95.8	55.0	16.8	1.8	26.5
6	WACHOVIA BANK NATIONAL ASSN	NC	579,258	3,393,720	6.0	94.0	84.6	3.1	3.2	9.1
7	WELLS FARGO BANK NA	SD	552,170	1,869,881	9.9	90.1	94.2	3.3	2.4	0.1
8	BANK OF NEW YORK MELLON	NY	163,006	1,153,880	5.6	94.4	80.5	18.5	0.9	0.1
9	STATE STREET BANK&TRUST CO	MA	142,458	645,128	0.7	99.3	5.3	94.7	0.0	0.0
10	SUNTRUST BANK	GA	174,237	292,928	22.0	78.0	92.4	3.1	4.0	0.5
11	PNC BANK NATIONAL ASSN	PA	140,011	143,677	6.5	93.5	92.0	4.3	0.5	3.1
12	KEYBANK NATIONAL ASSN	OH	95,515	124,338	13.1	86.9	84.6	9.2	0.4	5.7
13	NORTHERN TRUST CO	IL	65,796	123,814	0.0	100.0	5.1	94.7	0.0	0.1
14	NATIONAL CITY BANK	OH	146,013	114,220	23.0	77.0	96.2	1.9	0.0	1.8
15	U S BANK NATIONAL ASSN	OH	258,527	105,621	5.7	94.3	87.8	9.7	0.0	2.4
16	REGIONS BANK	AL	137,000	86,324	13.4	86.6	98.8	0.5	0.7	0.7
17	BRANCH BANKING&TRUST CO	NC	139,275	79,208	5.8	94.2	99.1	0.8	0.0	0.1
18	FIFTH THIRD BANK	OH	68,458	70,383	0.1	99.9	82.1	16.0	1.4	0.5
19	RBS CITIZENS NATIONAL ASSN	RI	134,826	51,728	0.0	100.0	90.4	9.1	0.0	0.5
20	MORGAN STANLEY BANK NA	UT	66,742	41,306	0.0	100.0	27.6	0.0	0.2	72.1
21	GMAC BANK	UT	36,366	40,738	0.0	100.0	96.5	0.0	3.5	0.0
22	UBS BANK USA	UT	33,958	40,315	0.0	100.0	100.0	0.0	0.0	0.0
23	CTIBANK SOUTH DAKOTA N A	SD	84,228	36,685	0.0	100.0	100.0	0.0	0.0	0.0
24	UNION BANK NATIONAL ASSN	CA	68,255	35,319	11.8	88.2	80.1	10.6	9.3	0.0
25	BANK OF OKLAHOMA NA	OK	16,389	27,285	2.4	97.6	83.4	0.3	16.3	0.0
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES			\$7,707,483	\$201,502,177	\$7,119,284	\$194,382,893	\$168,959,633	\$14,848,226	\$3,103,370	\$14,590,948
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES			2,786,837	462,035	4,394	457,641	413,102	23,823	8,957	16,153
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES			10,494,320	201,964,212	7,123,678	194,840,534	169,372,734	14,872,049	3,112,327	14,607,101
TOP 25 COMMERCIAL BANKS & TC: % OF TOTAL COMMERCIAL BKS & TCs WITH DERIVATIVES				(%)	(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BKS & TCs WITH DERIVATIVES				99.8	3.5	83.7	7.4	1.5	7.2	7.2
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				100.0	3.5	83.9	7.4	1.5	7.2	7.2

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Numbers may not add due to rounding.

Data source: Call Reports, schedule RC-L

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
Second Quarter 2009

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq209.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities Second Quarter 2009

Executive Summary

- The notional value of derivatives held by U.S. commercial banks increased \$1.5 trillion in the second quarter, or 0.7%, to \$203.5 trillion.
- U.S. commercial banks reported revenues of \$5.2 billion trading cash and derivative instruments in the second quarter of 2009, compared to a record \$9.8 billion in the first quarter.
- Net current credit exposure decreased 20% to \$555 billion.
- Derivative contracts remain concentrated in interest rate products, which comprise 85% of total derivative notional values. The notional value of credit derivative contracts decreased by 8% during the quarter to \$13.4 trillion.

The OCC's quarterly report on bank derivatives activities and trading revenues is based on Call Report information provided by all insured U.S. commercial banks and trust companies, as well as on other published financial data.

A total of 1,110 insured U.S. commercial banks reported derivatives activities at the end of the second quarter, an increase of 47 banks from the prior quarter. Nonetheless, most derivatives activity in the U.S. banking system continues to be dominated by a small group of large financial institutions. Five large commercial banks represent 97% of the total banking industry notional amounts and 88% of industry net current credit exposure.

While market or product concentrations are normally a concern for bank supervisors, there are three important mitigating factors with respect to derivatives activities. First, there are a number of other providers of derivatives products whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is concentrated in those institutions that have the resources needed to be able to operate this business in a safe and sound manner. Third, the OCC and other supervisors have examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation, and compliance risks of derivatives activities.

In addition to the OCC's on-site supervisory activities, the OCC continues to work with other financial supervisors and major market participants to address infrastructure issues in OTC derivatives, including development of objectives and milestones for stronger trade processing and improved market transparency across all OTC derivatives categories.

Revenues

Banks reported trading revenues of \$5.2 billion in the second quarter, down 47% from the record \$9.8 billion in the first quarter. Notwithstanding the large drop in trading revenues, the second quarter performance was still the sixth highest revenue quarter for commercial banks. Bank trading results benefited from solid core financial intermediation business flows, favorable (although declining) bid/offer spreads, as well as fewer write-downs on legacy credit assets. As noted in previous quarterly reports, another factor that has had a major impact on trading revenues is the recognition of changes in the value of derivatives payables and receivables. During the second quarter, following results of the supervisory capital stress tests for large banks and signs that the U.S.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
JUNE 30, 2009, \$ MILLIONS**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT (OTC)	SPOT FX
1	JPMORGAN CHASE & CO.	NY	\$2,026,642	\$79,859,262	\$1,008,158	\$2,444,272	\$8,366,945	\$51,026,085	\$10,200,567	\$6,813,235	\$592,105	\$592,105
2	BANK OF AMERICA CORPORATION	NC	2,236,060	75,356,021	3,441,058	913,628	9,388,878	50,377,333	5,936,946	5,298,179	145,404	145,404
3	GOLDMAN SACHS GROUP, INC., THE	NY	890,137	47,788,625	915,471	976,950	1,574,865	31,390,368	6,784,398	6,146,573	195,349	195,349
4	MORGAN STANLEY	NY	676,957	40,597,309	945,685	1,223,606	5,581,603	23,246,821	3,914,408	5,685,186	195,583	195,583
5	CITIGROUP INC.	NY	1,848,533	34,182,847	599,726	2,638,633	5,400,635	16,705,091	5,992,808	2,845,954	402,762	402,762
6	WELLS FARGO & COMPANY	CA	1,284,176	4,988,889	373,009	50,063	1,433,589	2,403,742	506,796	221,690	17,079	17,079
7	HSBC NORTH AMERICA HOLDINGS INC.	IL	383,821	3,125,126	49,087	83,365	540,379	1,442,368	186,273	823,654	45,512	45,512
8	TAUNUS CORPORATION	NY	366,350	1,268,133	109,701	155,741	689,680	179,321	14,355	119,335	334	334
9	BANK OF NEW YORK MELLON CORPORATION, THE	NY	203,246	1,259,693	27,294	49,047	406,658	450,129	325,699	866	34,933	34,933
10	STATE STREET CORPORATION	MA	152,921	538,829	4,508	0	494,096	2,956	37,099	170	27,946	27,946
11	BARCLAYS GROUP US INC.	DE	323,685	361,203	31,061	145,084	164,747	19,624	0	687	0	0
12	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	279,788	307,975	62,113	6,601	21,338	160,613	51,642	5,669	1,485	1,485
13	SUNTRUST BANKS, INC.	GA	176,854	297,969	21,571	24,724	50,311	160,174	40,416	773	263	263
14	GMAC INC.	MI	181,250	281,695	34,123	68,013	35,320	123,350	20,869	20	0	0
15	METLIFE, INC.	NY	509,457	190,929	15,056	0	37,848	57,703	73,454	6,867	0	0
16	NORTHERN TRUST CORPORATION	IL	75,045	154,008	0	0	144,056	9,649	169	133	16,151	16,151
17	KEYCORP	OH	98,389	120,992	13,081	0	9,304	81,785	9,810	7,012	550	550
18	U.S. BANCORP	MN	265,560	110,206	20	0	38,700	60,630	8,221	2,635	711	711
19	BB&T CORPORATION	NC	152,398	84,753	13,729	0	18,765	46,494	5,765	0	47	47
20	REGIONS FINANCIAL CORPORATION	AL	142,825	84,425	1,563	3,500	4,726	71,254	2,740	642	5	5
21	FIFTH THIRD BANCORP	OH	115,984	75,749	164	0	13,277	48,947	12,263	1,098	940	940
22	CITIZENS FINANCIAL GROUP, INC.	RI	153,304	63,475	0	0	5,486	54,345	2,280	1,365	64	64
23	CAPITAL ONE FINANCIAL CORPORATION	VA	171,911	61,637	295	0	2,945	58,397	0	0	0	0
24	TD BANKNORTH INC.	ME	131,356	48,669	0	0	6,328	34,373	7,717	251	21	21
25	UNIONBANCAL CORPORATION	CA	73,985	37,171	3,954	0	2,177	22,042	8,998	0	732	732
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			\$12,940,635	\$291,245,589	\$7,670,426	\$8,783,227	\$34,432,657	\$178,233,593	\$34,143,692	\$27,981,994	\$1,677,976	

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

**DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
JUNE 30, 2009, \$ MILLIONS**

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,663,998	\$79,941,219	4.1	95.9	80.8	7.8	2.9	8.5
2	GOLDMAN SACHS BANK USA	NY	119,678	40,477,262	1.5	98.5	94.1	3.3	0.0	2.6
3	BANK OF AMERICA NA	NC	1,450,830	39,064,884	4.2	89.8	94.1	4.9	0.5	4.8
4	CITIBANK NATIONAL ASSN	NV	1,165,400	31,943,721	3.1	96.9	79.0	12.3	0.7	8.0
5	WELLS FARGO BANK NA	SD	1,100,177	5,111,215	3.2	91.8	89.0	3.5	2.8	4.7
6	HSBC BANK USA NATIONAL ASSN	VA	158,959	3,152,580	8.7	96.3	54.8	17.6	1.5	26.2
7	BANK OF NEW YORK MELLON	NY	162,003	1,271,036	6.0	94.0	81.1	18.1	0.7	0.1
8	STATE STREET BANK&TRUST CO	MA	150,465	539,065	0.8	99.2	1.5	98.5	0.0	0.0
9	SUNTRUST BANK	GA	170,140	295,908	15.6	84.4	93.4	2.4	4.0	0.3
10	NATIONAL CITY BANK	OH	141,714	178,217	33.2	66.8	97.8	1.2	0.0	1.0
11	NORTHERN TRUST CO	IL	62,156	153,419	0.0	100.0	3.8	96.1	0.0	0.1
12	PNC BANK NATIONAL ASSN	PA	136,388	138,199	6.9	93.1	92.1	4.7	0.4	2.8
13	KEYBANK NATIONAL ASSN	OH	95,249	116,734	11.1	88.9	85.3	8.1	0.6	6.0
14	U S BANK NATIONAL ASSN	OH	260,445	101,139	0.0	100.0	85.9	11.5	0.1	2.5
15	BRANCH BANKING&TRUST CO	NC	147,644	87,487	15.7	84.3	99.4	0.6	0.0	0.0
16	REGIONS BANK	AL	135,430	82,219	6.2	93.8	98.8	0.5	0.0	0.8
17	FIFTH THIRD BANK	OH	64,601	68,855	0.2	99.8	80.6	16.4	2.5	0.5
18	MORGAN STANLEY BANK NA	UT	65,328	54,096	0.0	100.0	36.5	0.0	0.2	63.3
19	RBS CITIZENS NATIONAL ASSN	RI	121,919	51,496	0.0	100.0	89.8	7.9	0.0	2.3
20	UBS BANK USA	UT	33,926	49,108	0.0	100.0	100.0	0.0	0.0	0.0
21	UNION BANK NATIONAL ASSN	CA	73,554	37,171	10.6	89.4	83.7	6.5	9.8	0.0
22	BANK OF OKLAHOMA NA	OK	15,858	29,565	4.0	96.0	74.5	0.3	25.2	0.0
23	TD BANK NATIONAL ASSN	DE	104,413	28,687	0.0	100.0	93.4	5.8	0.0	0.9
24	HUNTINGTON NATIONAL BANK	OH	50,950	28,376	0.0	100.0	99.3	0.1	0.1	0.4
25	ALLY BANK	UT	42,460	26,441	0.0	100.0	91.0	0.0	9.0	0.0
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES					\$7,311,933	\$195,716,165	\$171,517,807	\$15,145,148	\$2,940,325	\$13,424,819
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES					4,433	427,441	385,655	20,897	10,233	15,089
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES					7,316,366	196,143,606	171,903,463	15,166,045	2,950,558	13,439,907
TOP 25 COMMERCIAL BANKS & TC: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					99.8	96.2	84.3	7.4	1.4	6.6
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					0.2	0.2	0.2	0.0	0.0	0.0
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					100.0	96.4	84.5	7.5	1.5	6.6

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts

Note: Numbers may not add due to rounding.

Note: Beginning in 2009, Wells Fargo Bank NA and Wachovia Bank NA are combined for the purpose of this report

Data source: Call Reports, schedule RC-1

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
Third Quarter 2009

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq309.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities Third Quarter 2009

Executive Summary

- The notional value of derivatives held by U.S. commercial banks increased \$804 billion in the third quarter, or 0.4%, to \$204.3 trillion.
- U.S. commercial banks reported trading revenues of \$5.7 billion trading cash and derivative instruments in the third quarter of 2009, up 11% from \$5.2 billion in the second quarter.
- Net current credit exposure decreased 13% to \$484 billion.
- Derivative contracts remain concentrated in interest rate products, which comprise 84% of total derivative notional values. The notional value of credit derivative contracts decreased by 3% during the quarter to \$13 trillion.

The OCC's quarterly report on trading revenues and bank derivatives activities is based on Call Report information provided by all insured U.S. commercial banks, trust companies, U.S. financial holding companies, as well as on other published financial data.

A total of 1,065 insured U.S. commercial banks reported derivatives activities at the end of the third quarter, a decrease of 45 banks from the prior quarter. Nonetheless, derivatives activity in the U.S. banking system continues to be dominated by a small group of large financial institutions. Five large commercial banks represent 97% of the total banking industry notional amounts and 88% of industry net current credit exposure.

While market or product concentrations are normally a concern for bank supervisors, there are three important mitigating factors with respect to derivatives activities. First, there are a number of other providers of derivatives products whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is concentrated in those institutions that have the resources needed to be able to operate this business in a safe and sound manner. Third, the OCC and other supervisors have examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation, and compliance risks of derivatives activities.

In addition to the OCC's on-site supervisory activities, the OCC continues to work with other financial supervisors and major market participants to address infrastructure issues in OTC derivatives, including development of objectives and milestones for stronger trade processing and improved market transparency across all OTC derivatives categories.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
SEPTEMBER 30, 2009, \$ MILLIONS**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT DERIVATIVES (OTC)	SPOT FX
1	JPMORGAN CHASE & CO.	NY	2,041,009	79,397,766	1,127,221	2,456,790	8,176,928	51,202,526	10,058,629	6,375,671		884,263
2	BANK OF AMERICA CORPORATION	NC	2,252,814	75,034,108	3,824,908	1,239,257	8,983,562	49,477,991	5,918,346	5,590,044		256,794
3	GOLDMAN SACHS GROUP, INC., THE	NY	882,586	49,830,777	1,525,996	2,389,806	1,651,333	31,521,178	6,980,170	5,762,294		218,684
4	MORGAN STANLEY	NY	769,503	41,830,926	1,257,498	942,045	5,718,427	24,366,723	4,063,778	5,482,455		239,247
5	CITIGROUP INC.	NY	1,888,599	34,473,426	597,600	2,816,978	5,535,722	16,374,764	6,383,881	2,764,481		539,304
6	WELLS FARGO & COMPANY	CA	1,228,625	4,356,115	212,010	9,036	1,197,896	2,192,172	476,962	288,039		23,464
7	HSBC NORTH AMERICA HOLDINGS INC.	IL	390,658	2,969,731	50,077	63,631	516,379	1,353,284	180,757	805,604		62,720
8	TAUNUS CORPORATION	NY	368,225	1,304,604	103,427	203,323	692,208	173,012	13,235	119,399		450
9	BANK OF NEW YORK MELLON CORPORATION, THE	NY	212,470	1,284,938	24,764	51,134	413,506	448,686	346,013	836		44,332
10	STATE STREET CORPORATION	MA	162,730	608,840	704	0	574,243	2,872	30,852	170		37,973
11	BARCLAYS GROUP US INC.	DE	377,926	376,466	0	190,050	163,262	22,590	0	565		0
12	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	271,450	331,177	52,037	46,282	14,991	166,533	46,138	5,196		1,646
13	GMAC INC.	MI	178,257	293,165	89,860	25	31,258	148,511	23,511	0		0
14	SUNTRUST BANKS, INC.	GA	172,814	278,323	26,296	18,076	27,952	165,668	39,652	679		321
15	METLIFE, INC.	NY	535,192	193,156	15,668	0	33,557	58,120	78,818	6,994		0
16	NORTHERN TRUST CORPORATION	IL	77,927	152,907	0	0	145,932	6,654	218	103		13,038
17	REGIONS FINANCIAL CORPORATION	AL	140,169	121,338	43,047	2,000	3,979	68,480	3,150	682		4
18	KEYCORP	OH	96,985	107,883	11,038	8	6,065	77,599	8,326	4,847		772
19	U.S. BANCORP	MN	265,058	102,305	220	2,400	31,518	59,088	6,511	2,568		874
20	FIFTH THIRD BANCORP	OH	110,740	69,976	94	0	8,148	45,472	15,189	1,073		927
21	BB&T CORPORATION	NC	165,329	69,710	7,917	0	13,491	40,490	7,812	0		36
22	CITIZENS FINANCIAL GROUP, INC.	RI	150,538	60,361	0	0	4,850	51,944	2,049	1,518		88
23	CAPITAL ONE FINANCIAL CORPORATION	VA	168,504	58,447	190	0	2,646	55,611	0	0		0
24	TD BANKNORTH INC.	ME	138,987	48,871	0	0	6,516	37,294	4,812	248		4
25	UNIONBANCAL CORPORATION	CA	78,153	38,379	3,259	0	2,291	22,679	10,151	0		337
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			13,125,250	293,393,697	8,973,830	10,430,841	33,956,660	178,139,941	34,698,959	27,193,466		2,325,275

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

**DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
SEPTEMBER 30, 2009, \$ MILLIONS**

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,669,868	\$78,971,770	4.3	95.7	80.8	8.0	3.1	8.1
2	GOLDMAN SACHS BANK USA	NY	114,868	41,971,848	3.6	96.4	94.3	3.4	0.0	2.2
3	BANK OF AMERICA NA	NC	1,460,147	40,100,260	4.8	95.2	89.2	5.3	0.5	5.0
4	CITIBANK NATIONAL ASSN	NV	1,186,754	31,972,635	4.0	96.0	79.2	12.3	0.7	7.8
5	WELLS FARGO BANK NA	SD	1,066,079	4,475,152	4.9	95.1	86.7	4.1	2.9	6.3
6	HSBC BANK USA NATIONAL ASSN	VA	168,263	3,005,488	3.6	96.4	53.0	18.3	1.8	26.8
7	BANK OF NEW YORK MELLON	NY	166,539	1,296,349	5.9	94.1	82.0	17.2	0.8	0.1
8	STATE STREET BANK&TRUST CO	MA	160,147	609,125	0.1	99.9	0.9	99.0	0.0	0.0
9	SUNTRUST BANK	GA	166,171	276,263	16.1	83.9	93.1	2.3	4.4	0.2
10	PNC BANK NATIONAL ASSN	PA	146,902	153,256	8.2	91.8	92.7	4.7	0.3	2.3
11	NORTHERN TRUST CO	IL	64,933	152,319	0.0	100.0	3.3	96.6	0.0	0.1
12	NATIONAL CITY BANK	OH	131,594	150,714	32.6	67.4	97.5	1.4	0.0	1.1
13	REGIONS BANK	AL	135,594	119,265	37.8	62.2	99.0	0.4	0.0	0.6
14	KEYBANK NATIONAL ASSN	OH	93,760	104,194	10.6	89.4	86.5	8.1	0.7	4.7
15	U S BANK NATIONAL ASSN	OH	259,943	93,389	2.8	97.2	83.3	14.0	0.0	2.7
16	BRANCH BANKING&TRUST CO	NC	159,146	71,953	11.0	89.0	99.4	0.6	0.0	0.0
17	FIFTH THIRD BANK	OH	109,196	65,866	0.1	99.9	80.5	15.5	2.3	1.6
18	RBS CITIZENS NATIONAL ASSN	RI	118,883	48,789	0.0	100.0	89.1	8.4	0.0	2.5
19	MORGAN STANLEY BANK NA	UT	65,487	47,824	0.0	100.0	38.4	0.0	0.2	61.4
20	UBS BANK USA	UT	31,437	43,048	0.0	100.0	100.0	0.0	0.0	0.0
21	UNION BANK NATIONAL ASSN	CA	77,733	38,379	8.5	91.5	83.4	6.9	9.8	0.0
22	FIRST TENNESSEE BANK NA	TN	26,230	28,061	0.9	99.1	100.0	0.0	0.0	0.0
23	HUNTINGTON NATIONAL BANK	OH	51,988	27,646	0.0	100.0	99.3	0.1	0.1	0.4
24	TD BANK NATIONAL ASSN	DE	108,026	26,280	0.0	100.0	93.3	5.8	0.9	0.9
25	ALLY BANK	UT	52,513	26,146	0.0	100.0	93.7	0.0	6.3	0.0
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES					\$8,688,993	\$195,187,026	\$172,221,954	\$15,588,832	\$3,092,735	\$12,972,498
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES					4,471	383,727	339,477	20,086	15,244	13,391
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES					8,693,463	195,570,754	172,561,432	15,608,918	3,107,979	12,985,889
TOP 25 COMMERCIAL BANKS & TC: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					4.3	95.6	84.3	7.6	1.5	6.4
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					0.0	0.2	0.2	0.0	0.0	0.0
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					4.3	95.7	84.5	7.6	1.5	6.4

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Numbers may not add due to rounding.

Note: Beginning in 2009, Wells Fargo Bank NA and Wachovia Bank NA are combined for the purpose of this report

Data source: Call Reports, schedule RC-L

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
Fourth Quarter 2009

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq409.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities Fourth Quarter 2009

Executive Summary

- The notional value of derivatives held by U.S. commercial banks increased \$8.5 trillion in the fourth quarter, or 4.2%, to \$212.8 trillion.
- U.S. commercial banks reported trading revenues of \$1.9 billion in the fourth quarter, down 66% from \$5.7 billion in the third quarter. For the year, banks reported record trading revenues of \$22.6 billion, compared to a loss of \$836 million in 2008.
- In the fourth quarter, net current credit exposure decreased 18%, or \$86 billion, to \$398 billion. Net current credit exposure dropped 50% during 2009.
- Derivative contracts remain concentrated in interest rate products, which comprise 84% of total derivative notional values. The notional value of credit derivative contracts, at \$14 trillion, represents 7% of total notionals. Credit derivatives notional totals increased by 8% during the quarter.

The OCC's quarterly report on trading revenues and bank derivatives activities is based on Call Report information provided by all insured U.S. commercial banks and trust companies, reports filed by U.S. financial holding companies, and other published data.

A total of 1,030 insured U.S. commercial banks reported derivatives activities at the end of the fourth quarter, a decrease of 35 banks from the prior quarter. Derivatives activity in the U.S. banking system continues to be dominated by a small group of large financial institutions. Five large commercial banks represent 97% of the total banking industry notional amounts and 88% of industry net current credit exposure.

While market or product concentrations are normally a concern for bank supervisors, there are three important mitigating factors with respect to derivatives activities. First, because this report focuses on U.S. commercial banking companies, there are a number of other providers of derivatives products whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is concentrated in those banking companies that have the resources needed to be able to operate this business in a safe and sound manner. Third, the OCC and other supervisors have examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation, and compliance risks of derivatives activities.

In addition to the OCC's on-site supervisory activities, the OCC continues to work with other financial supervisors and major market participants to address infrastructure issues in OTC derivatives, including development of objectives and milestones for stronger trade processing and improved market transparency across all OTC derivatives categories.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
DECEMBER 31, 2009, \$ MILLIONS**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	TOTAL	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT DERIVATIVES (OTC)	SPOT FX
1	JPMORGAN CHASE & CO.	NY	2,031,989	78,664,994	1,202,652	2,063,200	9,449,952	50,138,710	9,816,592	5,993,888	61,128		
2	BANK OF AMERICA CORPORATION	NC	2,224,705	72,628,715	2,677,235	1,409,928	11,266,127	46,047,242	5,484,090	5,644,093	116,681		
3	GOLDMAN SACHS GROUP, INC., THE	NY	849,278	48,850,049	1,308,021	2,148,075	1,757,716	31,659,624	6,726,181	5,250,432	172,066		
4	MORGAN STANLEY	NY	773,420	41,505,827	1,130,858	692,719	6,303,688	24,982,952	3,421,896	4,973,714	104,327		
5	CITIGROUP INC.	NY	1,856,646	39,345,065	620,603	2,570,960	4,914,036	21,925,200	6,767,251	2,547,015	390,042		
6	WELLS FARGO & COMPANY	CA	1,243,646	4,062,612	192,810	12,989	1,142,392	2,059,626	486,774	168,021	14,714		
7	HSBC NORTH AMERICA HOLDINGS INC.	IL	391,332	2,872,695	65,001	57,236	448,134	1,352,904	183,760	765,659	40,080		
8	BANK OF NEW YORK MELLON CORPORATION, THE	NY	212,336	1,290,001	36,657	51,424	393,203	466,586	341,325	806	24,243		
9	TAUNUS CORPORATION	NY	369,105	1,049,023	68,452	180,708	498,732	183,005	25,402	92,724	108		
10	STATE STREET CORPORATION	MA	156,756	624,852	750	0	546,122	2,838	74,972	170	19,539		
11	BARCLAYS GROUP US INC.	DE	365,703	351,735	0	151,479	164,516	31,869	3,114	756	0		
12	GMAC INC.	MI	172,313	312,346	62,757	74	39,682	171,650	37,893	290	0		
13	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	269,922	286,419	44,055	18,625	10,309	162,941	46,082	4,407	933		
14	SUNTRUST BANKS, INC.	GA	174,166	239,600	20,641	8,188	12,323	164,515	33,252	682	423		
15	METLIFE, INC.	NY	539,314	195,877	14,968	0	30,280	59,760	84,147	6,723	0		
16	NORTHERN TRUST CORPORATION	IL	82,142	172,206	0	0	165,420	6,480	178	127	10,618		
17	REGIONS FINANCIAL CORPORATION	AL	142,354	115,497	33,097	2,000	2,096	74,424	3,164	716	7		
18	KEYCORP	OH	93,382	103,526	8,980	0	6,979	71,632	11,396	4,538	287		
19	U.S. BANCORP	MN	281,176	101,118	475	6,500	30,322	55,041	6,656	2,124	533		
20	TD BANK US HOLDING COMPANY	ME	145,483	86,131	0	0	12,586	68,466	4,839	241	1		
21	FIFTH THIRD BANCORP	OH	113,380	69,428	57	0	8,857	44,829	14,667	1,018	415		
22	BB&T CORPORATION	NC	165,764	66,250	5,292	0	12,360	38,764	9,834	0	48		
23	CAPITAL ONE FINANCIAL CORPORATION	VA	169,400	59,236	225	0	2,369	56,625	17	0	0		
24	CITIZENS FINANCIAL GROUP, INC.	RI	148,012	58,332	0	0	5,191	49,502	2,306	1,332	84		
25	UNIONBANCAL CORPORATION	CA	85,598	40,099	3,012	0	2,105	26,003	8,979	0	295		
TOP 25 HOLDING COMPANIES WITH DERIVATIVES					13,057,323	293,051,633	7,496,599	9,374,105	37,225,497	179,901,188	33,594,767	25,459,477	956,574

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.
Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.
Note: Numbers may not add due to rounding.
Data sources: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-1

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.

Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.

Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

DISTRIBUTION OF DERIVATIVE CONTRACTS IN DERIVATIVES
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
DECEMBER 31, 2009, \$ MILLIONS

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,627,684	\$78,545,384	3.9	96.1	80.8	9.1	2.5	7.6
2	BANK OF AMERICA NA	NC	1,465,221	44,315,928	5.6	94.4	85.7	5.1	0.4	8.9
3	GOLDMAN SACHS BANK USA	NY	91,016	41,595,932	2.0	98.0	94.4	3.6	0.0	1.9
4	CITIBANK NATIONAL ASSN	NV	1,161,361	37,546,159	3.4	96.6	83.0	10.4	0.6	6.1
5	WELLS FARGO BANK NA	SD	1,118,861	4,178,720	4.8	95.2	88.2	4.0	3.4	4.3
6	HSBC BANK USA NATIONAL ASSN	VA	167,165	2,894,963	3.8	96.2	81.0	19.8	1.8	26.5
7	BANK OF NEW YORK MELLON	NY	164,275	1,301,857	6.8	93.2	81.0	18.3	0.6	0.1
8	STATE STREET BANK&TRUST CO	MA	153,741	625,139	0.1	99.9	0.7	90.8	8.5	0.0
9	PNC BANK NATIONAL ASSN	PA	260,310	293,425	21.3	78.7	96.0	2.4	0.1	1.4
10	SUNTRUST BANK	GA	164,341	237,540	12.1	87.9	92.5	2.5	4.7	0.3
11	NORTHERN TRUST CO	IL	68,809	171,619	0.0	100.0	3.0	96.9	0.0	0.1
12	REGIONS BANK	AL	138,007	115,563	30.4	69.6	98.8	0.5	0.0	0.6
13	KEYBANK NATIONAL ASSN	OH	90,179	99,893	8.9	91.1	87.1	7.8	0.6	4.5
14	U S BANK NATIONAL ASSN	OH	276,376	92,842	7.5	92.5	83.3	14.4	0.1	2.3
15	BRANCH BANKING&TRUST CO	NC	159,676	68,227	7.8	92.2	99.4	0.6	0.0	0.0
16	FIFTH THIRD BANK	OH	112,736	65,318	0.1	99.9	78.8	16.2	3.5	1.6
17	TD BANK NATIONAL ASSN	DE	140,039	50,280	0.0	100.0	91.4	8.1	0.0	0.5
18	RBS CITIZENS NATIONAL ASSN	RI	116,921	48,105	0.0	100.0	88.7	8.8	0.0	61.1
19	MORGAN STANLEY BANK NA	UT	66,159	41,467	0.0	100.0	38.6	0.0	0.2	0.0
20	UNION BANK NATIONAL ASSN	CA	85,196	40,099	7.5	92.5	84.9	6.0	9.1	0.0
21	TD BANK USA NATIONAL ASSN	ME	10,063	35,852	0.0	100.0	72.2	27.8	0.0	0.0
22	HUNTINGTON NATIONAL BANK	OH	51,111	27,219	0.0	100.0	99.2	0.2	0.2	0.4
23	CAPITAL ONE NATIONAL ASSN	VA	127,360	27,008	0.8	99.2	100.0	0.0	0.0	0.0
24	ALLY BANK	UT	55,303	25,915	0.0	100.0	92.3	0.0	7.7	0.0
25	DEUTSCHE BANK TR CO AMERICAS	NY	45,875	21,994	0.0	100.0	59.7	19.0	0.0	21.3
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES					\$8,217,463	\$204,249,003	\$179,249,946	\$16,541,578	\$2,648,138	\$14,026,804
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES					8,753	332,408	304,817	11,525	15,908	8,912
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES					8,226,217	204,581,411	179,554,763	16,553,103	2,664,046	14,035,716
TOP 25 COMMERCIAL BANKS & TC: % OF TOTAL COMMERCIAL BKS & TCs WITH DERIVATIVES					(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BKS & TCs WITH DERIVATIVES					99.8	96.0	84.2	7.8	1.2	6.6
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					100.0	0.2	0.1	0.0	0.0	0.0
						96.1	84.4	7.8	1.3	6.6

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Numbers may not add due to rounding.

Note: Beginning in 2Q09, Wells Fargo Bank NA and Wachovia Bank NA are combined for the purpose of this report.

Data source: Call Reports, schedule RC-1

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
First Quarter 2010

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq110.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities First Quarter 2010

Executive Summary

- The notional value of derivatives held by U.S. commercial banks increased \$3.6 trillion in the first quarter, or 1.7%, to \$216.5 trillion.
- U.S. commercial banks reported trading revenues of \$8.3 billion in the first quarter, 15% lower than \$9.8 billion of revenue in the first quarter of 2009.
- Credit exposure from derivatives continues to decline. Net current credit exposure decreased 10%, or \$40 billion, to \$359 billion. Net current credit exposure dropped 50% during 2009.
- Derivative contracts remain concentrated in interest rate products, which comprise 84% of total derivative notional values. The notional value of credit derivative contracts, at \$14.4 trillion, represents 7% of total notionals. Credit derivatives increased by 2.3% during the quarter.

The OCC's quarterly report on trading revenues and bank derivatives activities is based on Call Report information provided by all insured U.S. commercial banks and trust companies, reports filed by U.S. financial holding companies, and other published data.

A total of 1,050 insured U.S. commercial banks reported derivatives activities at the end of the first quarter, an increase of 20 banks from the prior quarter. Derivatives activity in the U.S. banking system continues to be dominated by a small group of large financial institutions. Five large commercial banks represent 97% of the total banking industry notional amounts and 86% of industry net current credit exposure.

While market or product concentrations are normally a concern for bank supervisors, there are three important mitigating factors with respect to derivatives activities. First, because this report focuses on U.S. commercial banking companies, there are a number of other providers of derivatives products whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is concentrated in those banking companies that have the resources needed to be able to operate this business in a safe and sound manner. Third, the OCC and other supervisors have examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation, and compliance risks of derivatives activities.

In addition to the OCC's on-site supervisory activities, the OCC continues to work with other financial supervisors and major market participants to address infrastructure issues in OTC derivatives, including development of objectives and milestones for stronger trade processing and improved market transparency across all OTC derivatives categories.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
MARCH 31, 2010, \$ MILLIONS**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT DERIVATIVES (OTC)	SPOT FX
1	JPMORGAN CHASE & CO.	NY	2,135,796	76,890,800	1,325,757	2,351,306	11,911,719	46,389,294	9,275,748	5,636,976	5,636,976	505,731
2	BANK OF AMERICA CORPORATION	NC	2,340,667	71,157,841	2,913,740	1,893,630	11,726,441	44,141,038	5,361,181	5,121,811	5,121,811	194,545
3	GOLDMAN SACHS GROUP, INC., THE	NY	880,677	49,141,620	1,104,300	2,604,747	4,816,528	27,290,974	8,419,509	4,905,582	4,905,582	245,608
4	CITIGROUP INC.	NY	2,002,213	42,309,303	588,566	2,818,820	6,239,884	23,317,641	6,832,786	2,512,206	2,512,206	559,519
5	MORGAN STANLEY	NY	819,719	40,730,729	132,008	795,040	7,455,031	24,212,372	3,534,457	4,601,821	4,601,821	158,342
6	WELLS FARGO & COMPANY	CA	1,223,630	3,722,843	166,938	14,763	984,143	1,933,254	469,320	154,425	154,425	17,550
7	HSBC NORTH AMERICA HOLDINGS INC.	NY	345,383	3,157,619	77,637	59,725	612,736	1,494,356	134,154	779,011	779,011	77,212
8	BANK OF NEW YORK MELLON CORPORATION, THE	NY	220,966	1,486,213	40,149	96,811	483,631	494,315	370,491	816	816	52,648
9	TANUS CORPORATION	MA	364,079	1,089,363	88,056	225,372	582,437	187,213	22,626	87,486	87,486	73
10	STATE STREET CORPORATION	MA	152,881	682,870	9,772	0	0	6,084	84,432	145	145	38,047
11	BARCLAYS GROUP US INC.	DE	427,837	589,030	0	256,646	298,499	26,988	6,143	754	754	1,362
12	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	265,433	336,827	63,715	59,147	11,566	165,826	31,854	4,519	4,519	1,362
13	GMAC INC.	MI	179,428	307,285	42,722	601	43,000	176,641	44,095	226	226	0
14	SUNTRUST BANKS, INC.	GA	171,796	265,201	26,987	23,765	14,986	165,231	32,835	1,397	1,397	455
15	NORTHERN TRUST CORPORATION	IL	76,319	198,343	0	0	191,937	6,098	181	127	127	16,329
16	METLIFE, INC.	NY	565,566	198,048	14,683	0	29,755	62,800	82,793	8,017	8,017	0
17	REGIONS FINANCIAL CORPORATION	AL	137,287	116,583	31,754	2,001	3,440	73,654	5,098	636	636	117
18	KEYCORP	OH	95,260	102,247	7,200	1,830	9,265	67,629	12,460	3,863	3,863	436
19	TD BANK US HOLDING COMPANY	ME	154,722	93,980	0	0	17,939	70,825	5,021	195	195	2
20	U.S. BANCORP	MIN	282,428	92,332	100	5,815	27,612	49,823	6,861	2,121	2,121	1,008
21	FIFTH THIRD BANCORP	OH	112,651	76,084	54	2,965	7,921	42,717	21,404	1,024	1,024	646
22	BB&T CORPORATION	NC	163,700	64,587	5,689	0	13,067	35,139	10,692	0	0	93
23	CITIZENS FINANCIAL GROUP, INC.	RI	143,962	56,613	0	0	5,172	47,720	2,352	1,369	1,369	26
24	CAPITAL ONE FINANCIAL CORPORATION	VA	200,708	52,697	285	14	2,179	50,219	0	0	0	0
25	UNIONBANCAL CORPORATION	CA	85,472	35,826	2,603	0	1,761	23,795	7,667	0	0	313
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			13,548,581	292,955,285	6,642,714	11,212,997	45,969,260	170,531,647	34,774,159	23,824,508	23,824,508	1,870,062

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.
Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.
Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

**DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
MARCH 31, 2010, \$ MILLIONS**

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,674,523	\$76,462,884	4.5	95.5	80.8	9.4	2.4	7.4
2	BANK OF AMERICA NA	NC	1,496,322	46,640,634	5.4	94.6	83.5	5.9	0.3	10.4
3	CITIBANK NATIONAL ASSN	NV	1,171,094	41,123,397	3.9	96.1	83.6	10.1	0.6	5.7
4	GOLDMAN SACHS BANK USA	NY	89,744	41,117,428	0.8	99.2	95.0	3.6	0.0	1.3
5	WELLS FARGO BANK NA	SD	1,065,890	3,762,741	4.6	95.4	88.0	4.5	3.2	4.3
6	HSBC BANK USA NATIONAL ASSN	VA	183,562	3,202,094	3.9	96.1	55.1	18.9	1.6	24.3
7	BANK OF NEW YORK MELLON	NY	162,064	1,500,972	9.1	90.9	81.5	18.0	0.5	0.1
8	STATE STREET BANK&TRUST CO	MA	149,611	685,600	1.4	98.6	2.8	89.5	7.6	0.0
9	PNC BANK NATIONAL ASSN	DE	254,518	345,443	35.5	64.5	96.3	2.3	0.1	1.3
10	SUNTRUST BANK	GA	160,993	263,141	19.3	80.7	93.0	2.0	4.4	0.5
11	NORTHERN TRUST CO	IL	63,110	197,740	0.0	100.0	2.6	97.4	0.0	0.1
12	REGIONS BANK	AL	133,186	115,961	29.1	70.9	98.4	1.0	0.0	0.5
13	KEYBANK NATIONAL ASSN	OH	91,953	98,570	9.1	90.9	87.8	7.7	0.6	3.9
14	U S BANK NATIONAL ASSN	OH	277,509	87,498	6.8	93.2	83.1	14.4	0.1	2.4
15	FIFTH THIRD BANK	OH	110,801	71,974	4.2	95.8	70.8	24.5	3.3	1.4
16	BRANCH BANKING&TRUST CO	NC	157,652	66,830	8.5	91.5	99.4	0.6	0.0	0.0
17	TD BANK NATIONAL ASSN	DE	148,084	54,208	0.0	100.0	88.4	9.1	0.0	0.4
18	RBS CITIZENS NATIONAL ASSN	RI	114,492	47,125	0.0	100.0	64.5	35.5	0.0	2.6
19	TD BANK USA NATIONAL ASSN	ME	12,066	39,772	0.0	100.0	100.0	0.0	0.0	0.0
20	WOODLANDS COMMERCIAL BANK	UT	3,017	36,292	0.0	92.7	83.0	6.2	10.8	0.0
21	UNION BANK NATIONAL ASSN	CA	85,053	35,826	7.3	92.7	30.3	0.0	0.2	69.5
22	MORGAN STANLEY BANK NA	UT	72,292	32,010	0.0	100.0	64.3	18.9	0.0	16.7
23	DEUTSCHE BANK TR CO AMERICAS	NY	45,147	27,942	0.0	100.0	34.9	61.9	3.2	0.0
24	FIA CARD SERVICES NA	DE	212,896	27,727	3.2	96.8	99.2	0.3	0.2	0.3
25	HUNTINGTON NATIONAL BANK	OH	51,418	26,668	0.0	100.0				
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES					\$8,574,277	\$207,496,200	\$181,635,114	\$17,579,315	\$2,493,811	\$14,362,237
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES					13,892	367,799	345,680	17,105	16,835	2,069
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES					8,588,169	207,863,999	181,980,795	17,596,420	2,510,646	14,364,306
TOP 25 COMMERCIAL BANKS & TC: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					99.8	95.9	83.9	8.1	1.2	6.6
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES					100.0	100.0	100.0	100.0	100.0	100.0

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts

Note: Numbers may not add due to rounding.

Note: Beginning in 2009, Wells Fargo Bank NA and Wachovia Bank NA are combined for the purpose of this report

Data source: Call Reports, schedule RC-L

OCC'S Quarterly Report on Bank Trading and Derivatives Activities
Second Quarter 2010

<https://www.occ.gov/topics/capital-markets/financial-markets/derivatives/dq210.pdf>



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

OCC's Quarterly Report on Bank Trading and Derivatives Activities Second Quarter 2010

Executive Summary

- The notional value of derivatives held by U.S. commercial banks increased \$6.9 trillion in the second quarter, or 3.2%, to \$223.4 trillion.
- U.S. commercial banks reported trading revenues of \$6.6 billion in the second quarter, 28% higher than \$5.2 billion in the second quarter of 2009.
- Credit exposure from derivatives increased in the second quarter, after five consecutive quarterly declines. Net current credit exposure increased 11%, or \$38 billion, to \$397 billion.
- Derivative contracts remain concentrated in interest rate products, which comprise 84% of total derivative notional values. The notional value of credit derivative contracts, at \$13.9 trillion, represents 6% of total notionals. Credit derivatives declined by 3.4% during the quarter.

The OCC's quarterly report on trading revenues and bank derivatives activities is based on Call Report information provided by all insured U.S. commercial banks and trust companies, reports filed by U.S. financial holding companies, and other published data.

A total of 1,064 insured U.S. commercial banks reported derivatives activities at the end of the second quarter, an increase of 14 banks from the prior quarter. Derivatives activity in the U.S. banking system continues to be dominated by a small group of large financial institutions. Five large commercial banks represent 96% of the total banking industry notional amounts and 85% of industry net current credit exposure.

While market or product concentrations are normally a concern for bank supervisors, there are three important mitigating factors with respect to derivatives activities. First, because this report focuses on U.S. commercial banking companies, there are a number of other providers of derivatives products whose activity is not reflected in the data in this report. Second, because the highly specialized business of structuring, trading, and managing derivatives transactions requires sophisticated tools and expertise, derivatives activity is concentrated in those banking companies that have the resources needed to be able to operate this business in a safe and sound manner. Third, the OCC and other supervisors have examiners on-site at the largest banks to continuously evaluate the credit, market, operation, reputation, and compliance risks of derivatives activities.

In addition to the OCC's on-site supervisory activities, the OCC continues to work with other financial supervisors and major market participants to address infrastructure issues in OTC derivatives, including development of objectives and milestones for stronger trade processing and improved market transparency across all OTC derivatives categories.

TABLE 2

**NOTIONAL AMOUNT OF DERIVATIVE CONTRACTS
TOP 25 HOLDING COMPANIES IN DERIVATIVES
JUNE 30, 2010, \$ MILLIONS**

RANK	HOLDING COMPANY	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	FUTURES (EXCH TR)	OPTIONS (EXCH TR)	FORWARDS (OTC)	SWAPS (OTC)	OPTIONS (OTC)	DERIVATIVES (OTC)	CREDIT DERIVATIVES (OTC)	SPOT FX
1	JPMORGAN CHASE & CO.	NY	2,014,019	75,563,510	1,311,384	2,104,151	11,760,508	46,001,677	9,033,357	5,352,433	5,352,433	766,772
2	BANK OF AMERICA CORPORATION	NC	2,386,087	71,659,303	3,490,446	1,809,271	11,637,978	44,358,876	5,473,911	4,886,822	4,886,822	310,824
3	GOLDMAN SACHS GROUP, INC., THE	NY	883,529	48,135,817	1,151,364	1,964,809	4,525,220	27,783,377	8,271,455	4,439,592	4,439,592	224,325
4	CITIGROUP INC.	NY	1,937,666	45,414,409	737,425	2,455,136	6,608,718	26,379,719	6,761,608	2,471,803	2,471,803	667,640
5	MORGAN STANLEY	NY	809,456	40,573,169	129,537	867,384	6,467,550	24,986,775	3,601,417	4,520,506	4,520,506	230,678
6	WELLS FARGO & COMPANY	CA	1,225,862	3,692,884	138,566	16,024	1,020,359	1,974,874	421,128	121,933	121,933	19,270
7	HSBC NORTH AMERICA HOLDINGS INC.	NY	333,998	3,651,872	83,547	312,907	696,490	1,658,918	140,173	759,638	759,638	56,821
8	BANK OF NEW YORK MELLON CORPORATION, THE	NY	235,944	1,442,136	88,219	486,919	488,774	488,774	371,867	776	776	42,433
9	TAUNUS CORPORATION	NY	348,586	1,042,271	89,810	208,366	454,172	191,824	17,450	80,649	80,649	797
10	STATE STREET CORPORATION	MA	160,664	748,675	20,284	0	634,512	13,263	80,441	155	155	28,931
11	BARCLAYS GROUP US INC.	DE	356,186	654,012	0	234,928	389,327	22,848	6,143	766	766	2
12	ALLY FINANCIAL INC.	MI	176,814	390,312	8,858	122	47,520	268,745	64,918	149	149	0
13	PNC FINANCIAL SERVICES GROUP, INC., THE	PA	281,769	365,234	63,280	84,601	10,518	171,854	30,974	4,007	4,007	1,369
14	SUNTRUST BANKS, INC.	GA	170,668	285,187	41,451	17,375	15,655	170,268	38,704	1,734	1,734	499
15	METLIFE, INC.	NY	573,907	212,759	16,398	0	34,362	65,898	88,646	7,456	7,456	0
16	NORTHERN TRUST CORPORATION	IL	80,049	203,891	0	0	197,117	6,520	127	127	127	12,078
17	REGIONS FINANCIAL CORPORATION	AL	135,393	143,422	1,314	2,000	3,986	131,716	3,834	572	572	61
18	U.S. BANKCORP	MN	283,243	98,418	1,642	4,500	35,506	46,691	7,896	2,183	2,183	1,011
19	TD BANK US HOLDING COMPANY	ME	159,058	94,478	0	0	15,534	74,062	4,694	188	188	14
20	KEYCORP	OH	94,287	94,141	4,178	1,100	8,983	64,387	11,853	3,640	3,640	2,409
21	FIFTH THIRD BANCORP	OH	112,025	75,397	122	2,987	7,837	42,808	20,654	988	988	717
22	BB&T CORPORATION	NC	155,083	64,263	5,028	0	15,804	34,712	8,718	0	0	45
23	CITIZENS FINANCIAL GROUP, INC.	RI	140,019	56,190	0	0	5,638	46,215	3,102	1,235	1,235	49
24	CAPITAL ONE FINANCIAL CORPORATION	VA	197,489	49,557	265	0	2,054	47,219	19	0	0	9
25	UNIONBANCAL CORPORATION	CA	84,310	38,984	1,802	0	2,764	26,287	8,141	0	0	480
TOP 25 HOLDING COMPANIES WITH DERIVATIVES			13,296,102	294,750,102	7,322,282	10,173,879	45,065,031	175,058,326	34,471,232	22,659,351	22,659,351	2,367,234

Note: Currently, the Y-9 report does not differentiate credit derivatives by contract type. Credit derivatives have been included in the sum of total derivatives.
Note: Prior to the first quarter of 2005, total derivatives included spot foreign exchange. Beginning in that quarter, spot foreign exchange has been reported separately.
Note: Numbers may not add due to rounding.

Data source: Consolidated Financial Statements for Bank Holding Companies, FR Y-9, schedule HC-L

TABLE 3

DISTRIBUTION OF DERIVATIVE CONTRACTS
TOP 25 COMMERCIAL BANKS AND TRUST COMPANIES IN DERIVATIVES
JUNE 30, 2010, \$ MILLIONS

RANK	BANK NAME	STATE	TOTAL ASSETS	TOTAL DERIVATIVES	PERCENT EXCH TRADED CONTRACTS (%)	PERCENT OTC CONTRACTS (%)	PERCENT INT RATE CONTRACTS (%)	PERCENT FOREIGN EXCH CONTRACTS (%)	PERCENT OTHER CONTRACTS (%)	PERCENT CREDIT DERIVATIVES (%)
1	JPMORGAN CHASE BANK NA	OH	\$1,568,093	\$75,253,921	4.2	95.8	80.7	9.5	2.7	7.1
2	BANK OF AMERICA NA	NC	1,518,958	48,520,359	6.8	93.2	83.5	6.6	0.2	9.7
3	CITIBANK NATIONAL ASSN	NV	1,157,877	45,990,989	3.3	96.7	84.8	9.4	0.6	5.2
4	GOLDMAN SACHS BANK USA	NY	95,515	42,087,305	2.1	87.9	95.2	3.6	0.0	1.2
5	HSBC BANK USA NATIONAL ASSN	VA	183,595	3,682,856	10.1	99.9	60.9	16.8	1.8	20.6
6	WELLS FARGO BANK NA	SD	1,073,280	3,612,256	3.9	96.1	89.8	3.4	3.3	3.5
7	BANK OF NEW YORK MELLON	NY	175,994	1,457,905	7.8	92.2	78.8	20.6	0.5	0.1
8	STATE STREET BANK&TRUST CO	MA	157,474	749,151	2.7	97.3	4.6	88.6	6.8	0.0
9	PNC BANK NATIONAL ASSN	DE	251,075	372,107	39.7	60.3	97.1	1.7	0.1	1.1
10	SUNTRUST BANK	GA	160,509	282,826	20.8	79.2	93.4	1.8	4.2	0.6
11	NORTHERN TRUST CO	IL	66,624	203,290	0.0	100.0	2.7	97.3	0.0	0.1
12	REGIONS BANK	AL	131,011	133,058	2.5	97.5	98.5	1.1	0.0	0.4
13	U S BANK NATIONAL ASSN	OH	278,465	95,311	6.4	93.6	84.9	12.7	0.1	2.3
14	KEYBANK NATIONAL ASSN	OH	90,663	90,524	5.7	94.3	85.7	9.5	0.7	4.0
15	FIFTH THIRD BANK	OH	110,026	71,292	4.4	95.6	67.3	27.6	3.7	1.4
16	BRANCH BANKING&TRUST CO	NC	149,199	65,569	7.7	92.3	99.3	0.7	0.0	0.0
17	TD BANK NATIONAL ASSN	DE	152,617	56,568	0.0	100.0	88.4	11.3	0.0	0.3
18	RBS CITIZENS NATIONAL ASSN	RI	112,312	47,471	0.0	100.0	87.9	10.0	0.0	0.0
19	MORGAN STANLEY BANK NA	UT	65,746	43,519	0.0	100.0	54.1	0.0	0.1	45.8
20	UNION BANK NATIONAL ASSN	CA	83,842	38,994	4.6	95.4	80.4	8.4	0.0	0.0
21	TD BANK USA NATIONAL ASSN	ME	11,021	37,911	0.0	100.0	66.8	33.2	0.0	0.0
22	ALLY BANK	UT	61,693	33,730	0.0	100.0	93.6	0.0	6.4	0.0
23	DEUTSCHE BANK TR CO AMERICAS	NY	42,306	28,967	0.0	100.0	66.8	17.9	0.0	15.4
24	HUNTINGTON NATIONAL BANK	OH	51,212	26,311	0.0	100.0	96.2	0.5	0.2	3.2
25	BANK OF OKLAHOMA NA	OK	16,621	25,374	6.1	93.9	74.5	0.4	25.1	0.0
TOP 25 COMMERCIAL BANKS & TCs WITH DERIVATIVES			\$7,765,727	\$223,007,561	\$9,786,497	\$213,221,064	\$188,264,517	\$18,180,644	\$2,688,821	\$13,873,578
OTHER COMMERCIAL BANKS & TCs WITH DERIVATIVES			2,703,882	368,673	14,963	353,710	331,371	25,978	8,899	2,425
TOTAL FOR COMMERCIAL BANKS & TCs WITH DERIVATIVES			10,469,610	223,376,234	9,801,460	213,574,774	188,595,888	18,206,623	2,697,720	13,876,003
TOP 25 COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				(%)	(%)	(%)	(%)	(%)	(%)	(%)
OTHER COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				99.8	4.4	84.3	8.1	8.1	1.2	6.2
TOTAL FOR COMMERCIAL BANKS & TCs: % OF TOTAL COMMERCIAL BANKS & TCs WITH DERIVATIVES				100.0	0.0	0.1	0.0	0.0	0.0	0.0
					4.4	84.4	8.2	8.2	1.2	6.2

Note: Currently, the Call Report does not differentiate credit derivatives by over the counter or exchange traded. Credit derivatives have been included in the "over the counter" category as well as in the sum of total derivatives here.

Note: "Foreign Exchange" does not include spot fx.

Note: "Other" is defined as the sum of commodity and equity contracts.

Note: Numbers may not add due to rounding.

Data source: Call Reports, schedule RC-L